STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAWN R. GALLAGHER
COMMISSIONER

PIONEER PLASTICS CORPORATION)
ANDROSCOGGIN COUNTY)
AUBURN, MAINE)
A-448-70-A-A/I)

DEPARTMENTAL
FINDING OF FACT AND ORDER
PART 70 AIR EMISSION LICENSE

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Pioneer Plastics Corporation (Pioneer)
LICENSE NUMBER	A-448-70-A-A/I
LICENSE TYPE	Initial Part 70 License
NAICS CODES	325211, 322222, 32613
NATURE OF BUSINESS	Manufacturer of decorative laminate, melamine coated paper, and specialty resins
FACILITY LOCATION	Auburn, Maine
DATE OF LICENSE ISSUANCE	April 20, 2004
LICENSE EXPIRATION DATE	April 20, 2009

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Boiler #4	55.5 MMBtu/hr	Fuel Burning Equipment
Boiler #6	96.6 MMBtu/hr (fuel oil) 96.8 MMBtu/hr (natural gas)	Fuel Burning Equipment
Boiler #8	5.0 MMBtu/hr	Fuel Burning Equipment
Fire Pump	2.1 MMBtu/hr	Fuel Burning Equipment
Thermal Oxidizer/ Boiler #5	39.5 MMBtu/hr (#6 oil)	Pollution Control/Fuel Burning Equipment
Urea Reactor K1	3,000 gallons	Process Equipment
Melamine Reactor K2	1,200 gallons	Process Equipment

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 764-1507

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EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Urea Reactor K3 / Resin Blender	5,000 gallons	Process Equipment
Polyester Reactor #1 K4	3,500 gallons	Process Equipment
Polyester Reactor #2 K5	3,500 gallons	Process Equipment
Letdown Reactor K6	5,000 gallons	Process Equipment
Pilot Reactor K7	100 gallons	Process Equipment
Polyester Reactor #3 K8	3,500 gallons	Process Equipment
Impregnator P1	350 ft/min*	Process Equipment
Impregnator P4	150 ft/min*	Process Equipment
Impregnator P5	600 ft/min*	Process Equipment
Coater C4	45 ft/min*	Process Equipment
Treater M1	110 ft/min*	Process Equipment
Treater M3	60 ft/min*	Process Equipment
Treater M4	140 ft/min*	Process Equipment
Treater M5	140 ft/min*	Process Equipment
Treater M6	140 ft/min*	Process Equipment
Treater M7	140 ft/min*	Process Equipment
Pilot Treater	20 ft/min*	Process Equipment
Pressroom	N/A	Process Equipment
Routers	N/A	Miscellaneous Equipment
Table Saws	N/A	Miscellaneous Equipment
Sanders	N/A	Miscellaneous Equipment
Dust Transport System	N/A	Miscellaneous Equipment
Central Vacuum	N/A	Miscellaneous Equipment
Terephthalic Acid Silo	318,000 pounds TA	Miscellaneous Equipment
Melamine Silo	303,000 pounds melamine	Miscellaneous Equipment
Terephthalic Acid Weigh Hopper - Poly 1	4,300 pounds TA	Miscellaneous Equipment
Terephthalic Acid Weigh Hopper - Poly 2,3	4,300 pounds TA	Miscellaneous Equipment
Melamine Weigh Hopper	4,000 pounds Melamine	Miscellaneous Equipment
Solvent Degreaser	20 gallons	Miscellaneous Equipment
Solvent Degreaser (DBE)	220 gallons	Miscellaneous Equipment
Surface Coating Press	2.5 gallons	Miscellaneous Equipment
Tank #29 - Methanol	20,000 gallons	Miscellaneous Equipment
Tank #30 - Formaldehyde	20,000 gallons	Miscellaneous Equipment
Tank #45 - Phenolic Resin Blend	10,000 gallons	Miscellaneous Equipment
Tank #46 - Phenolic Resin Blend	10,000 gallons	Miscellaneous Equipment
Tank #47 - Phenolic Resin Blend	10,000 gallons	Miscellaneous Equipment

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Urea Reactor K3 / Resin Blender	5,000 gallons	Process Equipment
Polyester Reactor #1 K4	3,500 gallons	Process Equipment
Polyester Reactor #2 K5	3,500 gallons	Process Equipment
Letdown Reactor K6	5,000 gallons	Process Equipment
Pilot Reactor K7	100 gallons	Process Equipment
Polyester Reactor #3 K8	3,500 gallons	Process Equipment
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Treater M1	110 ft/min*	Process Equipment
Treater M3	60 ft/min*	Process Equipment
Treater M4	140 ft/min*	Process Equipment
Treater M5	140 ft/min*	Process Equipment
Treater M6	140 ft/min*	Process Equipment
Treater M7	140 ft/min*	Process Equipment
Pilot Treater	20 ft/min*	Process Equipment
Pressroom	N/A	Process Equipment
Routers	N/A	Miscellaneous Equipment
Table Saws	N/A	Miscellaneous Equipment
Sanders	N/A	Miscellaneous Equipment
Dust Transport System	N/A	Miscellaneous Equipment
Central Vacuum	N/A	Miscellaneous Equipment
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Tank #46 - Phenolic Resin Blend	10,000 gallons	Miscellaneous Equipment
Tank #47 - Phenolic Resin Blend	10,000 gallons	Miscellaneous Equipment

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Tank #48 - Phenolic Fast Cure	10,000 gallons	Miscellaneous Equipment
Tank #49 - Urea Resin	10,000 gallons	Miscellaneous Equipment
Tank #60 - Phenolic	12,500 gallons	Miscellaneous Equipment
Tank #66 - NPG Slurry Storage	15,000 gallons	Miscellaneous Equipment

Note: * Unit capacities for process equipment are listed for informational purposes only and are not intended as license restrictions.

C: Insignificant Activities:

The following emission units were listed on Pioneer's previous Chapter 115 license (A-448-72-K-A/R), but are now considered insignificant under MEDEP Chapter 140:

EMISSION UNIT	UNIT CAPACITY	UNIT TYPE	REGULATORY CITATION
Boiler #7	2.79 MMBtu/hr	Fuel Burning Equipment	MEDEP Chapter 140, Appendix B §B.2
Space Heater	0.07 MMBtu/hr	Fuel Burning Equipment	MEDEP Chapter 140, Appendix B §B.2
1 Grinder with Vacuum Receiver	N/A	Miscellaneous Equipment	MEDEP Chapter 140, Appendix B §A.58

The following emission units were not listed on Pioneer's previous Chapter 115 license (A-448-72-K-A/R), but are considered to be insignificant.

EMISSION UNIT	UNIT CAPACITY	UNIT TYPE	REGULATORY CITATION
Onan Gas Fired Back-up Generator	1.13 MMBtu/hr	Fuel Burning Equipment	MEDEP Chapter 140 Appendix B §B.3
Cummins Diesel Back-up Generator	1.2 MMBtu/hr	Fuel Burning Equipment	MEDEP Chapter 140 Appendix B §B.3
Environmental Control Booth	N/A	Ventilation Equipment	MEDEP Chapter 140, Appendix B §A.58
Screen Print *	N/A	Process Equipment	MEDEP Chapter 140, Appendix B §B.1.
Laboratory Laminate Presses	N/A	Process Equipment	MEDEP Chapter 140, Appendix §A.102

* The screen print operation listed in the Table above, is classified as an insignificant source based on Chapter 140 Appendix B "Size or Production Rate" criteria. This license will include a restriction on the

usage of VOCs to maintain the Potential to Emit to less than one (1) ton of VOC emissions per year. Records will be maintained of VOC usage in the screen print operation to verify compliance.

Pioneer has additional insignificant activities that do not need to be listed in the Emission Equipment Table in I.B above.

D. Application Classification

The application for Pioneer does not include the licensing of increased emissions, however, it does include the licensing of a cold cleaning solvent degreaser which was overlooked in previous state air licenses. This degreaser is subject to Best Available Control Technology (BACT) and shall comply with the applicable MEDEP regulations.

The application also includes some additional sources that were overlooked in previous air licenses. These include a melamine powder storage silo and terephthalic acid powder storage silo which are equipped with fabric filters/baghouses. Three associated weigh hoppers for these silos are also present that are equipped with fabric filters/baghouses. The terephthalic acid (TA) silo is also equipped with a vacuum receiver to pull the TA into the silo which is also equipped with a fabric filter/baghouse. This equipment shall comply with the applicable MEDEP regulations.

Pioneer also operates a Central Vacuum System to clean up loose resin in the resin crushing/grinding area and an Environmental Control Booth used to keep dust away from the employees handling the crushed resin. This equipment is designed with baghouses/fabric filters to control particulate emissions. The Environmental Control Booth is classified as an Insignificant Source but the Central Vacuum is not. This equipment shall also comply with the applicable MEDEP regulations.

Pioneer has also requested greater flexibility in fuel switching while maintaining little to no increase in actual emissions. Therefore, this license is considered to be an Initial Part 70 License with a minor amendment issued under Chapter 140 of the Department's regulations for a Part 70 source.

E. Summary of Facility Requirements

Pioneer is (or will be) subject to the regulations listed below.

CITATION	TITLE
MEDEP Chapter 100	Definitions Regulation
MEDEP Chapter 101	Visible Emissions Regulation
MEDEP Chapter 102	Open Burning

CITATION	TITLE
MEDEP Chapter 103	Fuel Burning Equipment Particulate Emission Standard
MEDEP Chapter 105	General Process Source Particulate Emission Standard
MEDEP Chapter 106	Low Sulfur Fuel
MEDEP Chapter 109	Emergency Episode Regulation
MEDEP Chapter 110	Ambient Air Quality Standards
MEDEP Chapter 116	Prohibited Dispersion Techniques
MEDEP Chapter 123	Paper Coating Regulation
MEDEP Chapter 126	Capture Efficiency Test Procedures
MEDEP Chapter 129	Surface Coating Facilities
MEDEP Chapter 130	Solvent Degreasers
MEDEP Chapter 134	Reasonable Available Control Technology for Facilities that Emit Volatile Organic Compounds (VOC RACT)
MEDEP Chapter 137	Emission Statements
MEDEP Chapter 138	Reasonable Available Control Technology for Facilities that Emit Nitrogen Oxides (NOx RACT)
MEDEP Chapter 140	Part 70 Air Emission License Regulations
EPA 40 CFR Part 60, Subpart Kb	NSPS for Volatile Organic Liquid Storage Vessels
EPA 40 CFR Part 60, Subpart VVV	NSPS for Polymeric Coating of Supporting Substrates
EPA 40 CFR Part 61, Subpart M	National Emission Standards for Asbestos
EPA 40 CFR Part 63, Subpart OOO	Amino/Phenolic Resin Production NESHAP
EPA 40 CFR Part 63, Subpart JJJJ	Paper & Other Web (Surface Coating) NESHAP
EPA 40 CFR Part 63, Subpart OOOO	Printing, Coating, and Dyeing of Fabrics and Other Textiles NESHAP
EPA 40 CFR Part 63, Subpart FFFF	Miscellaneous Organic Chemical Production Processes NESHAP (MON)
EPA 40 CFR Part 63, Subpart EEEE	Organic Liquids Distribution (Non-Gasoline) NESHAP
EPA proposed 40 CFR Part 63, Subpart DDDDD	Industrial/Commercial/Institutional Boilers & Process Heaters NESHAP
EPA 40 CFR Part 68, Subpart G	Risk Management Plan (RMP)
EPA 40 CFR Part 82 Subpart F	Refrigerant Control

Facility-Wide Applicable Requirements

The following table highlights the emission limits and/or the operational standards and whether or not the applicable requirement is federally enforceable:

REGULATORY CITATION	REQUIREMENTS (EMISSION LIMITS, OPERATIONAL STANDARDS, ETC.)	FEDERALLY ENFORCEABLE
40 C.F.R. 61, Subpart M	Pioneer follows appropriate procedures for asbestos emission control listed in 40 C.F.R. §§61.145 and 63.150 when conducting renovations at the facility.	Yes
40 C.F.R. 68, Subpart G	Pioneer has completed and submitted a Risk Management Plan to EPA by June 21, 1999 as required.	Yes
40 C.F.R. Part 70	Pioneer has submitted a timely and complete Title V operating permit application consistent with an EPA-approved Maine Title V Program. [MEDEP Chapter 140]	Yes
MEDEP Chapter 100	General regulatory definitions applicable to all sources.	Yes
MEDEP Chapter 101	No person shall cause to be emitted any visible air contaminants from any general process including fugitive emission source that exceeds an opacity of 20% on a six minute block average in a one hour period.	Yes

REGULATORY CITATION	REQUIREMENTS (EMISSION LIMITS, OPERATIONAL STANDARDS, ETC.)	FEDERALLY ENFORCEABLE
MEDEP Chapter 134 - 6/16/97 Amendment #3 to the Chapter 115 Air Emission License (#A-448-71-P-A)	Pioneer applied for a source-specific RACT determination for all non-exempt sources of VOC at the facility under §3(A)(3) of this rule. The DEP made RACT determinations for the following non-exempt categories of VOC sources: 1. Tank Truck Activities 2. Storage Tanks 3. Weigh Tanks and Blend Tanks Located in Specialty Resins Dept 4. Polyester Reactors 5. Reactor "K3" 6. Melamine and Urea Reactors 7. Letdown and Cooling of Polyester Resin 8. Wastewater Streams 9. Pressroom 10. Treated Paper and Waste Materials Located in Treating and Resopreg Departments 11. Resin Blend Tanks, Holding Tanks, and Transfer Pots Located in the "Treating" and "Resopreg" Departments 12. Equipment Leaks 13. Cleanup Activities in Treating and Resopreg Departments 14. Handling of Various Raw Materials in Specialty Resins Department 15. Laboratory Activities 16. Emissions from Fabrication of Laminate 17. Handling of Hazardous Waste 18. Miscellaneous Activities Not Related to Manufacturing The non-CTG RACT requirements were included in Amendment #3 to the 1995 Air Emission License.	Yes. Approved by EPA on April 18, 2000, 40 C.F.R. §52.1020(c)(45); (65 Fed. Reg. 20749).
MEDEP Chapter 137	Pioneer files annual emission statements on criteria pollutants and biennial statements on HAP emissions.	Yes
MEDEP Chapter 138	The NOx RACT requirements of the rule were included in the 1995 Air Emission License # A-448-72-A/R.	Yes
MEDEP Chapter 140	General Title V, Part 70 Source Air Emission License Regulation applicable to all Part 70 sources.	Yes

II. Emission Unit Description

A. Process Description

Pioneer Plastics Corporation (Pioneer) operates a manufacturing plant in Auburn, Maine. The plant contains various fuel-burning devices and process equipment that emit air pollutants. The plant has the potential to emit greater than 100 tons per year of certain non-hazardous regulated air pollutants, and also has the potential to emit, in the aggregate, greater than 10 tons per year of a single hazardous air pollutant (HAP) as well as 25 tons per year or more of any combination of HAPs. Consequently, Pioneer is defined as a "Part 70 major source" under Chapter 100.

The facility's principal products consist of: (a) Pionite, a decorative laminate used for countertops and furniture; (b) amino resin coated paper used as a decorative surface for particleboard and other substrates; (c) polyester, phenolic or amino resin coated fiberglass mats; and (d) specialty resins produced both for resale and for on-site use.

The front end of the manufacturing process starts with the preparation of resins, including but not limited to, amino, phenolic, and polyester resins. Some resins are produced on-site in reactors, while other resins are purchased and then processed on-site. Pioneer produces resin in both liquid and solid form. Resins are initially in liquid or solution form following their production in reactors. Solid resin is obtained by allowing liquid resin to cool in containers, and then grinding the solid material into a granular or powder-like consistency. Resins are then stored for resale or delivered to coating lines where they are applied to paper or other substrates. There are four general types of coating operations performed at the plant: 1) impregnation of paper using phenolic resins; 2) impregnation/coating of various substrates using polyester resins; 3) impregnation/coating of paper using melamine and urea resins; and 4) coating of fiberglass mats using polyester, phenolic, and/or melamine resins. Each coating line consists of at least one application area where the resins are continuously applied to the substrate, and an oven where the coated or impregnated substrate is dried and/or the resin is cross-linked.

Treated papers are either stored for sale to customers or further processed to produce laminates. To produce laminates, Pioneer assembles layers of treated papers and presses them together under pressure and heat. Finished laminates are then routed, cut and sanded in the fabrication/inspection area.

In addition to the manufacturing equipment described above, Pioneer operates various supporting activities, including but not limited to raw material/finished product handling and storage, steam production using gas and oil-fired boilers, solvent degreasing, and wastewater treatment operations.

B. New License Equipment

For licensing purposes, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Department regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

1. Parts Washer (DBE):

During the drafting of this Part 70 air emissions license, Pioneer discovered an additional solvent degreaser which was not included in the current Chapter 115 air emission license or subsequent amendments. This source consists of a cold cleaning solvent washing system used to clean polyester resin from metal screens used for the production of polyester resins. This system meets the definition of a cold cleaning degreaser since it is used to remove contaminants from a metal surface and the solvent temperature is maintained below its boiling point. The filters are cleaned in a solvent bath that is heated to a temperature of 70°C. The bath has lids that are closed when the solvent system is not in use.

To meet the requirements of BACT and Chapter 130 "Solvent Degreasers" regulation, a cover shall be placed on the unit when not in use and appropriate labels as specified in Chapter 130 will be used. The solvent used in this degreaser will use a low vapor pressure solvent, thereby reducing the amount of VOC emitted. Currently the solvent used is dibasic ester (DBE) marketed by Dupont with a very low volatility even when heated. The vapor pressure of this material at elevated temperatures is below the 4.3 kPa regulatory level for control.

2. Storage Silos and Associated Equipment:

During the permitting process, Pioneer also discovered some additional sources which were not included in the original Chapter 115 permits. Pioneer owns and operates two silos for the storage of powdered materials. One currently stores melamine powder used for the production of melamine resins and the second contains terephthalic acid (TA) which is used in the production of polyester resins. Both of these silos are equipped with bag houses. There are three associated weigh tanks which are also equipped with bag

houses. The terephthalic acid system also has a vacuum receiver used to pull the TA from the railcar into the tank which is also equipped with a filter.

Opacity
Pioneer accepts streamlining for opacity requirements. The requirements in MEDEP Chapter 101 §2(C) are applicable, however, the BACT opacity requirement is more stringent and therefore will be streamlined into this initial Title V license. Visible emissions from the above mentioned miscellaneous equipment with fabric filter control shall not exceed an opacity of 10%, on a 6-minute block average basis, except for no more than (1) one (6) six minute block average in a 1-hour period. The facility shall take corrective action if visible emissions from the baghouses exceed 5% opacity (Chapter 140, BACT)

Particulate Matter
The requirements of MEDEP Chapter 105 §4 are applicable

Periodic Monitoring
Periodic monitoring shall include record keeping, including maintenance of the inspection logs of the baghouses.

3. Central Vacuum:

The plant is also equipped with a Central Vacuum System used to clean up loose resin. This equipment is also equipped with a baghouse/fabric filters. This equipment shall also comply with the applicable MEDEP regulations.

Opacity
Pioneer accepts streamlining for opacity requirements. The requirements in MEDEP Chapter 101 §2(C) are applicable, however, the BACT opacity requirement is more stringent and therefore will be streamlined into this initial Title V license. Visible emissions from the above mentioned miscellaneous equipment with fabric filter control shall not exceed an opacity of 10%, on a 6-minute block average basis, except for no more than (1) one (6) six minute block average in a 1-hour period. The facility shall take corrective action if visible emissions from the baghouses exceed 5% opacity (Chapter 140, BACT)

Particulate Matter
The requirements of MEDEP Chapter 105 §4 are applicable

Periodic Monitoring
Periodic monitoring shall include record keeping, including maintenance of the inspection logs of the baghouses.

C. **Existing Fuel Burning Equipment**

1. Boiler # 4

Boiler #4 is a 55.5 MMBtu/hr boiler manufactured in 1975 by Trane. Boiler #4 was first licensed on December 21, 1977, in Air Emission license #1233. Boiler #4 burns No. 6 fuel oil with a sulfur content no greater than 2.0% by weight, and is used to produce steam for the manufacturing process and space heating needs. Emissions exit through a 35.05 m stack. Pioneer operates Boiler #4 primarily in the winter months to produce auxiliary steam to meet peak steam demands. Boiler #4 is also a standby boiler in the event that Boiler #6 is not available. Pursuant to the NOx RACT requirements in MEDEP Chapter 138, Pioneer agreed to limit NOx emissions from Boiler #4 to 0.60 lbs/MMBtu and to limit annual consumption of No. 6 fuel oil in Boiler #4 to 2,200,000 gallons. This fuel limit, in conjunction with the 0.60 lbs/MMBtu limit results in potential NOx emissions less than 100 tons per year. By limiting the potential emission in this fashion, Boiler #4 meets the definition of an "auxiliary/standby boiler". NOx RACT requirements for an auxiliary/standby boiler are contained in Section 3(M) of Chapter 138 which requires an annual tune-up and record keeping.

If Boiler #4 is used more frequently and exceeds 350,000 gallons in any calendar year, then Pioneer shall perform a NOx and a PM stack test by July 1 of the following year to demonstrate compliance with the respective emission limits.

In July 2003, Pioneer requested a minor permit modification to burn #4 oil in place of natural gas in the Boiler #6 during the period of May 1 through September 30. This modification will require that while Boiler #6 is burning #4 oil in place of natural gas that the Boiler #4 will be required to burn #4 oil with a sulfur content not to exceed 0.7% instead of #6 fuel oil with a sulfur content not to exceed 2.0% by weight.

Streamlining
Opacity
Pioneer accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(2) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license. Visible emissions from Boiler #4 shall not exceed an opacity of 30 percent on a six (6) minute

block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period.

Sulfur Dioxide
Pioneer accepts streamlining for sulfur dioxide requirements. Chapter 106, Section 2(A)(2) of the Department's regulations and BPT requirements are applicable. Since Pioneer may be required to use #4 fuel with a maximum sulfur content of 0.7% by weight under some operating scenarios, the BPT limit is more stringent. Therefore, compliance with the BPT emission limit assures compliance with Chapter 106.

Nitrogen Oxides
Pioneer accepts streamlining for nitrogen oxide requirements. Chapter 138, Section (3)(M) of the Department's regulations and BPT requirements are applicable. The Best Practical Treatment (BPT) limit is as stringent. Therefore, only the BPT nitrogen oxides limit is included in this license. BPT requirements of MEDEP Chapter 140 require an annual NOx emission limit of 100 tons from Boiler #4. BPT for auxiliary/standby boilers as described in MEDEP Chapter 138 is applicable (NOx emissions from Boiler #4 are limited to 0.60 lbs/MMBtu).

HAP Emissions
Industrial, Commercial, and Institutional Boilers, and Process Heaters are Hazardous Air Pollutant (HAP) source categories scheduled for National Emission Standards for Hazardous Air Pollutants (NESHAPs), which are to be promulgated by EPA in the future.

Periodic Monitoring
The periodic monitoring shall include record keeping including records of fuel use through purchase receipts indicating amounts (gallons) and percent sulfur by weight. The fuel records shall be kept on a monthly and a 12-month rolling basis. Periodic monitoring shall also consist of record keeping which shall include records of annual tune-ups required under MEDEP Chapter 138.

2. Boiler # 6

Boiler #6 is a Combustion Engineering model 24-VP-12WR package boiler with "D" type tube arrangement. The boiler contains a single Coen DAZ burner which fires both gas and oil. The boiler's combustion control system is a Taylor Instruments MOD-30 with oxygen trim. The rated heat input capacity of the boiler is 96.8 MMBtu/hr. The nominal steam generating capacity is 80,000 pounds per hour at 450 psig. Pioneer purchases an "interruptable" natural gas supply and burns gas in Boiler #6 for approximately five months per year (May 1 through September 30). For the remaining portion of the year Pioneer burns No. 6 fuel oil with a sulfur content no greater than 0.7% by weight. Pioneer uses Boiler #6 to produce a majority of the steam required by the facility for the

manufacturing process and space heating needs. Emissions exit through a 115 foot stack. Boiler #6 was constructed in 1981 and installed as a replacement for Boiler #3. The BACT determination on Boiler #6 was made by the Department in the August 23, 1995 Air Emission License, #A-448-72-A/R.

In July of 2003 Pioneer submitted a request for a minor permit revision to allow for the flexibility to burn #4 fuel with a sulfur content not to exceed 0.7% in place of natural gas during the period of May 1 through September 30. This modification assumes that the other oil fired boilers at the facility will also burn the #4 oil (instead of #6 fuel oil with a maximum fuel sulfur content of 2.0% by weight) when Boiler #6 is burning #4 oil in place of natural gas. Based on emission factor calculations using the average fuel usages for a five-year period, emissions were relatively unchanged when compared to the use of natural gas. Pioneer has submitted sufficient data that shows the use of #4 fuel oil in lieu of natural gas in #6 Boiler, with the condition that all boilers switch from #6 fuel oil (2.0% sulfur content) to #4 fuel oil (0.7% sulfur content), does not increase overall criteria pollutant emissions.

Streamlining

Opacity

Pioneer accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(2) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license. Visible emissions from Boiler #6 shall not exceed an opacity of 30 percent on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period.

Particulate Matter

Pioneer accepts streamlining for particulate matter requirements. Chapter 103, Section 2(A)(3)(b) of the Department's regulations and BPT requirements are applicable. The Best Practical Treatment (BPT) particulate matter limits are more stringent. Therefore, only the more stringent BPT particulate matter limits are included in this license. In a previous licensing decision, the Department found that 0.15 lbs/MMBtu during oil firing and 0.02 lbs/MMBtu during gas firing represents BPT.

Sulfur Dioxide

Pioneer accepts streamlining for sulfur dioxide requirements. Chapter 106, Section 2(A)(2) of the Department's regulations and BPT requirements are applicable. Since Pioneer may be required to use #4 fuel with a maximum sulfur content of 0.7% by weight under some operating scenarios, the BPT limit is more stringent. Therefore, only the more stringent sulfur limit is included in this license.

Nitrogen Oxides
Pioneer accepts streamlining for nitrogen oxide requirements. Chapter 138, Section (3)(I) of the Department's regulations and BPT requirements are applicable. The Best Practical Treatment (BPT) limit is as stringent. Therefore, only the BPT nitrogen oxides limit is included in this license. To meet the requirements of BPT for this initial Part 70 Title V license, Boiler #6 shall be licensed to meet 0.47 lb/MMBtu emission limit.

HAP Emissions
Industrial, Commercial, and Institutional Boilers, and Process Heaters are (HAP) source categories scheduled for National Emission Standards for Hazardous Air Pollutants (NESHAPs), which is to be promulgated by EPA in the future.

Periodic Monitoring
The periodic monitoring shall include record keeping including records of fuel use through purchase receipts indicating amounts (gallons) and percent sulfur by weight. The fuel records shall be kept on a monthly and a 12-month rolling basis. In addition, the periodic monitoring shall also include records of when gas is available at the interruptible rate during specified months.

3. Boiler # 8

Boiler #8 is a 5.0 MMBtu/hr natural gas boiler manufactured by Geka and installed by Pioneer in 1994. Boiler #8 was licensed on September 17, 1993 in Amendment 3 to Air Emission License #2472. Boiler #8 is used to heat oil which in turn heats resins and/or raw materials. Emissions exit through a 15.24 m stack. Boiler #8 is required to fire natural gas only.

Streamlining.
Opacity
Pioneer accepts streamlining for opacity requirements. Chapter 101, Section 2(A) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license. Visible emissions from Boiler #8 shall not exceed an opacity of 10 percent on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period.

Particulate Matter
Pioneer accepts streamlining for particulate matter requirements. Chapter 103, Section 2(B)1 of the Department's regulations and BPT requirements are applicable. The Best Practical Treatment (BPT) particulate matter limits are more stringent. Therefore, only the more stringent BPT particulate matter limits are included in this license. In a previous

licensing decision, the Department found that 0.02 lbs/MMBtu during gas firing represents BPT.

HAP Emissions
Industrial, Commercial, and Institutional Boilers, and Process Heaters are Hazardous Air Pollutant (HAP) source categories scheduled for National Emission Standards for Hazardous Air Pollutants (NESHAPs), which are to be promulgated by EPA in the future.

4. Fire Pump

The Fire Pump is driven by a Cummins NT280 diesel engine with a maximum capacity of 2.1 MMBtu/hr. The Fire Pump was installed in 1970. The Fire Pump supplies water to the facility's sprinkler system in the event of a fire. Pioneer agreed to limit operation of the Diesel Engine to 2,292 hours per year in order to limit the NOx emissions from the Diesel Engine to less than 10 tons per year. By doing so, the Diesel Engine is exempt from NOx RACT requirements pursuant to Section 1.B.1 of MEDEP Chapter 138.

Opacity
Requirements in MEDEP Chapter 101 §2(A) are applicable, however, the BPT opacity requirement is more stringent and therefore will be streamlined into this initial Title V license. Visible emissions from the Fire Pump shall not exceed an opacity of 30 percent on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period.

Fuel Use
The NOx RACT MEDEP Chapter 138 requires a limit on the hours of operation. The sulfur content of the diesel fuel shall not exceed 0.05% by weight.

Periodic Monitoring
Periodic monitoring shall consist of record keeping to document that the diesel engine is not operated more than 2,292 hours per year in any calendar year.

Fuel Burning/Pollution Control Equipment

Thermal Oxidizer (Boiler #5)

Pioneer operates a VOC Incinerator referred to at the facility as the Thermal Oxidizer. The Thermal Oxidizer is used primarily to destroy volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) from the manufacturing process. The Thermal Oxidizer is also referred to as "Boiler #5" because it has a separate heat recovery

component which produces steam for the facility. The Thermal Oxidizer was manufactured by Hirt in 1982. The maximum heat input capacity from No. 6 fuel oil fired in the Thermal Oxidizer is 39.5 MMBtu/hr. The Thermal Oxidizer was first licensed on November 10, 1981 in Air Emission license #1996 and was installed at the facility in 1983. The Thermal Oxidizer was subject to an alternative NOx RACT determination under Chapter 138 as a "miscellaneous source". The Department determined that the Thermal Oxidizer as configured and operated employs NOx RACT by not compromising the Thermal Oxidizer's VOC destruction efficiency.

In its capacity as a boiler, the Thermal Oxidizer is subject to the following requirements:

Fuel Usage:

During normal operation Boiler #5 burns #6 fuel oil with a sulfur content not to exceed 2%. During the period of May 1 through September 30 if Boiler #6 switches to burning #4 oil in place of natural gas , Boiler # 5 will be restricted to burning #4 oil with a sulfur content not to exceed 0.7%.

Streamlining

Opacity

Pioneer accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(2) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license. Visible emissions from the Thermal Oxidizer (Boiler #5) shall not exceed an opacity of 30 percent on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period.

Sulfur Dioxide

Pioneer accepts streamlining for sulfur dioxide requirements. Chapter 106, Section 2(A)(2) of the Department's regulations and BPT requirements are applicable. Since Pioneer may be required to use #4 fuel with a maximum sulfur content of 0.7% by weight under some operating scenarios, the BPT limit is more stringent. Therefore, only the more stringent sulfur limit is included in this license.

Nitrogen Oxides

Pioneer accepts streamlining for nitrogen oxide requirements. Chapter 138, Section (3)(I) of the Department's regulations and BPT requirements are applicable. The Best Practical Treatment (BPT) limit is as stringent. Therefore, only the BPT nitrogen oxides limit is included in this license.

HAP Emissions
Industrial, Commercial, and Institutional Boilers, and Process Heaters are Hazardous Air Pollutant (HAP) source categories scheduled for National Emission Standards for Hazardous Air Pollutants (NESHAPs), which are to be promulgated by EPA in the future.

In its capacity as a pollution control device the Thermal Oxidizer it is subject to the following:

HAP Emissions
The thermal oxidizer shall also be subject to the control device requirements of the following NESHAP standards:

1. Amino/Phenolic Resin Production MACT (40 CFR Part 63 Subpart OOO)

2. The streamlined requirements of the Paper and Other Web Coating MACT (40 CFR Part 63 Subpart JJJJ) and the Printing, Coating and Dyeing of Fabrics and Other Textiles MACT (40 CFR Part 63 Subpart OOOO).

3. The thermal oxidizer shall also potentially be subject to the control device requirements of the Miscellaneous Organic Chemical Production Processes NESHAP (MON) (40 CFR Part 63 Subpart FFFF):

Periodic Monitoring
The periodic monitoring shall include record keeping associated with the stack testing to demonstrate compliance with NOx and particulate matter emission limits. The periodic monitoring shall also include the records documenting the annual ductwork inspections and tune-up required by the NOx RACT rule. [MEDEP Chapter 138]

The periodic monitoring shall also include record keeping associated with the destruction efficiency test to demonstrate compliance with the paper coating VOC requirements under MEDEP Chapters 123 and 126, as well as the daily records to demonstrate that a minimum combustion temperature is maintained in the Thermal Oxidizer combustion chamber. This minimum combustion temperature will be no lower than 1250°F as specified by State regulation but may actually be higher to meet the requirements of MACT rules specified above.

D. Process Equipment

1. Melamine and Urea (Amino) Resin Production: Reactors K1 and K2:

Reactors K1 and K2 primarily produce melamine resins, and occasionally urea resins. The capacity of K1 is 3,000 gallons and the capacity of K2 is 1,200 gallons.

Generally, powdered raw materials are added (charged) to liquid raw materials in the reactors through a charging hatch or a direct line. The charging hatch is then closed while the chemical reaction takes place. Process testing occurs as samples are collected during the cook cycle. After completion, the resulting resin is pumped into storage tanks to be used by production or for shipment off-site.

Opacity
Requirements in MEDEP Chapter 101 §2(C) are applicable, however, the BPT opacity requirement is more stringent and therefore will be streamlined into this initial Title V license. Visible emissions from K1 and K2 shall not exceed an opacity of 20% Opacity on a 6-minute block average basis except for no more than (1) one (6) six minute block average in a 1-hour period.

Particulate Matter
The requirements of MEDEP Chapter 105, §4 are applicable to K1 and K2.

HAP Emissions
HAP emissions (primarily formaldehyde) from the production of melamine and urea resins in K1 and K2 are subject to the requirements of the Amino/Phenolic Resin Production National Emission Standards for Hazardous Air Pollutants (NESHAPs) [also known as Maximum Achievable Control Technology (MACT) standards] set forth in 40 C.F.R. Part 63, Subpart OOO. A one year compliance extension request was granted by the Maine Department of Environmental Protection which sets a new compliance date of January 20, 2004. A one year extension was also granted for the performance testing and inspection and record keeping requirements. Quarterly reports are required to be submitted until the project is complete. The facility will be subject to the following requirements:

Emission standards: The batch reactor and non-reactor emissions will all be collected into a common closed vent system meeting the requirements of 40 CFR Part 63 Subpart SS and therefore will be subject to the requirements of 40 CFR § 63.1408 for Aggregate batch vent streams.

Heat Exchange: The heat exchange system is operated with the minimum pressure on the cooling water side of at least 35 kilopascals greater than the maximum pressure on the process side and therefore the requirements of 40 CFR § 63.1409 do not apply.

Equipment leaks: All equipment that contains or contacts 5 weight percent HAP or greater and operates for more than 300 hours per year shall comply with the requirements of 40 CFR Part 63 subpart UU.

2. Phenolic Resin Blending: Reactor K3

Reactor K3 was used at one time to produce phenolic resins, however, Pioneer currently purchases phenolic resins and now K3 is primarily used as a blending tank where phenolic resins and resin extenders are combined with methanol and/or acetone. K3 is occasionally used to produce urea resins. The capacity of K3 is 5,000 gallons.

Generally, powdered raw materials are added (charged) to liquid raw materials in the reactors through a charging hatch or a direct line. The charging hatch is then closed while the chemical reaction takes place. Process testing occurs as samples are collected during the cook cycle. After completion, the resulting resin is pumped into storage tanks to be used by production or for shipment off-site.

In 2002 Pioneer requested a minor revision to Air Emission License A-448-72-K-A/R to allow for process modifications associated with the K3 reactor. This revision was granted as Amendment #6 to the Air Emission license and assigned permit number A-448-71-T-A. The changes include operational flexibility that will allow raw material substitution of methanol for acetone in blending phenolic extender product mixes.

VOC is the only criteria pollutant that will change as a result of the proposed process change in K3 reactor, therefore, only VOC emissions are evaluated for net change. A net change in VOC emissions of 30 TPY was requested.

Based on this information, the application was processed as a non-major modification, under the requirements of Section 4 (B) of Chapter 115 of the Department's regulations. The application did not involve a relaxation or change in monitoring, testing, reporting or recordkeeping requirements. The licensed allowed VOC emission limit of 141 tons per year did not change as a result of this modification. The modification addressed process changes that increase a criteria pollutant and therefore a BACT analysis was also performed and can be found in Pioneer's application dated September 2002.

This permit includes a correction to the Amendment 6 (Permit Number A-448-71-T-A) to Air Emission License A-448-72-K-A/R. The amendment indicates that when blending phenolic resin that emissions will be vented to the thermal oxidizer. This is only the case when the process described in the amendment is used and methanol or another VOC/HAP is used to blend the phenolic extender, rather than acetone. When methanol is blended with the phenolic extender the emissions will be vented to the thermal oxidizer. Also when this methanol/VOC/phenolic extender blend is blended with phenolic resin the emissions will be vented to the thermal oxidizer. When the current practice is used of blending the extender with acetone and then blending the extender/acetone blend with phenolic resin the vapor condenser will be used.

Opacity
Requirements in MEDEP Chapter 101 §2(C) are applicable, however, the BPT opacity requirement is more stringent and therefore will be streamlined into this initial Part 70 air emissions license. Visible emissions from K3 shall not exceed an opacity of 20% opacity on a 6-minute block average basis except for no more than (1) one (6) six-minute block average in a 1-hour period.

Particulate Matter
The requirements of MEDEP Chapter 105, §4 are applicable to K3.

VOC Emissions
VOC emissions from K3 are controlled by either a vapor condenser or the thermal oxidizier and are subject to a RACT determination by the Department pursuant to MEDEP 134 and approved by EPA. When blending phenolic resins with a methanol/VOC/phenolic extender blend and when hot cutting products with a VOC/HAP based solvent in the K3 reactor, VOC/HAP emissions will be captured and ducted from the K3 reactor to the thermal oxidizer. The thermal oxidizer will be operated to achieve a minimum VOC/HAP destruction efficiency of 95 percent. When the above processes are conducted using acetone in place of the methanol/VOC, as is current practice, the vapor condenser will be used.

HAP Emissions
Based on an applicability determination made by the Maine Department of Environmental Protection and the US EPA, the HAP emissions from the blending of phenolic resins in the K3 reactor and the production of urea resin would not be subject to the requirements of the Amino/Phenolic Resin Production MACT (Subpart OOO). Since the production of an amino/phenolic resin does not account for the greatest percent of the annual design capacity of the unit on a mass basis, the Amino/Phenolic MACT does not apply. Since the K3 reactor is used for mixing resins and additives prior to being used in the coating process, it meets the definition of affiliated equipment as specified in the

Paper and Other Web Coating NESHAP (40CFR Part 63 Subpart JJJJ). Since this process unit is part of the affiliated equipment and is not part of the affected source for the Paper and Other Web Coating MACT it is subject to the Organic Liquid (Non-Gasoline) Distribution (OLD) MACT.

Also, when blending phenolic resins with a methanol/VOC/phenolic extender blend and when hot cutting products with a VOC/HAP based solvent in the K3 reactor, VOC/HAP emissions will be captured and ducted from the K3 reactor to the thermal oxidizer. The thermal oxidizer will be operated to achieve a minimum VOC/HAP destruction efficiency of 95 percent. When the above processes are conducted using acetone in place of the methanol/VOC, as is current practice, the vapor condenser will be used.

3. Polyester Resin Production: Reactors K4, K5, K6, K7 K8

Reactors K4, K5, K6, K7 and K8 produce polyester resins. The capacity of K4, K5 and K8 is 3500 gallons each; the capacity of K6 is 5000 gallons; and the capacity of K7 is 100 gallons. Generally, powdered raw materials are added (charged) to liquid raw materials in the reactors through a charging hatch or a direct line. Charging operations last approximately 1 to 3 hours during which minimal amounts of powder are vented to the atmosphere. The charging hatch is then closed while the chemical reaction takes place. Process testing occurs as samples are collected during the cook cycle. After the reaction process is complete, the resins are discharged, or letdown, from the reactors into drums as a liquid or into pans where they cool and solidify. The solidified resins are then crushed into specified particle sizes.

VOC Emissions

Air Emissions License #2472, issued on July 10, 1985, required the facility to install and operate a wet scrubber to reduce VOC emissions and odor complaints. BPT was determined as 90% control of VOC emissions. The Wet Scrubber System, installed in 1987, controlled odors but was technically unable to reduce VOC emissions by 90%. The 1985 BPT finding which claimed that a wet scrubber at Pioneer could reduce VOC emissions by 90% proved to be incorrect.

In 1993, Pioneer requested an amendment to Air Emission License #2472 to allow for the firing of polyester distillates in the Thermal Oxidizer. At the same time, Pioneer proposed to control VOC emissions from the polyester reactors by destruction in the Thermal Oxidizer. This request was accepted and formed the basis of Amendment 2 which required Pioneer to: 1) control VOC emissions from the polyester reactors by means of the Wet Scrubber System or the Thermal Oxidizer; 2) inventory VOC emissions

and hazardous air pollutants; and 3) submit a BPT analysis which will either justify existing controls or propose additional controls.

In 1997, as part of the non-CTG VOC RACT analysis conducted pursuant to MEDEP Chapter 134, a new RACT determination was made by the Department and approved by EPA. This RACT determination was incorporated into Amendment #3 to the 1995 Air Emission License and includes VOC controls for both polyester resin production and polyester resin blending operations. The RACT determination also included the letdown process and determined that the current operating practice represented RACT.

During the manufacturing of polyester resin, the reactor vessels are closed and the emissions are captured and conveyed to the Thermal Oxidizer for destruction. A wet scrubber is used as a back-up when the Thermal Oxidizer is down for maintenance, or when the paper coaters/impregnators are not on line. The wet scrubber is restricted in operation to 300 hours per year since the efficiency of the unit is not equivalent to the thermal oxidizer.

During the blending of polyester resin, solvents are blended into the resin by means of a "hot cutting" or "cold cutting" process. When VOC solvents are used the reactors are kept closed so that emissions are captured and conveyed to the Thermal Oxidizer. When non-VOCs are used as a solvent (e.g. acetone) the reactors are vented to the atmosphere during the blending operation.

HAP Emissions
The Production of Polyester Resins is a Hazardous Air Pollutant (HAP) source subcategory scheduled for a National Emission Standards for Hazardous Air Pollutants (NESHAPs), currently identified as the Miscellaneous Organic Chemical Production Processes, or the MON.

Opacity
Requirements in MEDEP Chapter 101 §2(C) are applicable, however, the BPT opacity requirement is more stringent and therefore will be streamlined into this initial Title V license. Visible emissions from K4 - K8 shall not exceed an opacity of 20% opacity on a 6-minute block average basis except for no more than (1) one (6) six-minute block average in a 1-hour period.

Particulate Matter
The requirements of MEDEP Chapter 105, §4 are applicable to K4 through K8.

4. Paper Coating

Pioneer operates eleven (11) treater/impregnator/coater lines for applying resins to a web substrate. Each line is used to apply resins to paper or other substrates by either impregnating and/or coating the substrate at the application area(s) of the line. Each line has an oven following each application area, within which the coated or impregnated substrate is dried and/or the resin is cross-linked.

There are seven treaters, M1, M3, M4, M5, M6, M7 and the Pilot Treater which have either one or two application areas for applying melamine and urea resins to decorative papers or fiberglass substrate. The melamine/urea resins applied by these treaters are low solvent coatings with a VOC content less than 2.9 lbs of VOC per gallon.

There are 3 impregnators, P1, P4, and P5, which primarily produce phenolic impregnated kraft paper. This paper is used as the substrate in the finished laminate product or shipped as is. P1 is the oldest machine, and is often used only as a paper sheeter to cut rolls of paper. Impregnators P1, P4, and P5 have only one coating application area each. VOC emissions are vented from these paper-coating lines (application areas and ovens) by means of a permanent total enclosure (PTE) to the Thermal Oxidizer for destruction.

There is one coater, C4, primarily used to produce polyester coated decorative products. These products are sold for use by others who apply them to the surface of various finished products. C4 is also used to apply polymeric coatings to a fiberglass web substrate. Coater C4 has two coating application areas. VOC emissions are vented from this paper-coating line (application areas and ovens) by means of a permanent total enclosure (PTE) to the Thermal Oxidizer for destruction.

The overall efficiency of the VOC control system is determined as the product of the capture system efficiency and the control device efficiency. If a source installs a permanent total enclosure (PTE) capture system that meets EPA and DEP specifications (Chapter 126, Appendix A, Procedure T of the Air Regulations) capture efficiency is determined to be 100% and capture efficiency need not be measured. The source, however, must still measure destruction efficiency using appropriate test methods.

All of the above treaters, impregnators and coaters are subject to the following standards:

VOC Emissions

VOCs are emitted from the paper coating lines. Because Pioneer is located in a non-attainment area for ozone, VOC emissions from the paper coating lines are subject to Reasonably Available Control Technology (RACT) requirements. Amendment 1 to Air

Emission License #2472 was issued on August 4, 1989 to incorporate federal RACT requirements for VOC control on Pioneer's paper coating lines. Amendment 1 was based on a site-specific RACT determination for the Pioneer facility that predated MEDEP Chapter 123, the Department's Paper Coating Regulation.

Amendment 1 required Pioneer to control VOC emissions from the paper coating lines by applying low solvent coatings, and/or by destroying VOC emissions in the Thermal Oxidizer. VOC emissions were limited to 2.9 lbs of VOC per gallon of coating for the coatings applied by the melamine treaters. When Air Emission License #2437 was renewed in 1995, the 1989 site specific RACT requirements outlined in Amendment 1 were incorporated into the new license.

MEDEP Chapter 123, initially promulgated on October 3, 1989, included a 2.9 lbs of VOC per gallon of coating standard for owners and operators of coating lines using low solvent coating technology, and an "Add-On Air Pollution Control Device" standard set at 4.8 lbs of VOC per gallon of solids as applied to the substrate on a continuous basis. The original Chapter 123 did not include the additional 85% overall VOC control requirement such as appeared in Pioneer's Air Emission License. When Chapter 123 was amended on October 2, 2000, the "Add-On Air Pollution Control Device" standard was amended to include an either or option: reduce overall VOC emissions by 95% or to a rate equal to 4.8 lbs of VOC emitted per gallon of solids as applied to the substrate on a continuous basis. The new Chapter 123 Add-On Control standard, along with the applicable record keeping requirements in the rule have been incorporated into this Part 70 license.

HAP Emissions

HAPs are emitted from all of the lines at Pioneer. These consist primarily of formaldehyde, phenol, methanol and ethylene glycol, depending on the resin formulation used on the individual line. These emissions result in the lines being subject to one of two MACT coating standards depending on the web substrate used and the percentage of time that the substrate is used on an individual line. These two standards include the Paper and Other Web Coating NESHAP (POWC MACT) (40 CFR Part 63, Subpart JJJJ) promulgated on December 4, 2002 with a compliance date of December 5, 2005 for existing sources and the Printing, Coating, and Dyeing of Fabrics and Other Textiles NESHAP (Fabric MACT) (40 CFR Part 63, Subpart OOOO) promulgated on May 29, 2003 with a compliance date of May 29, 2006. The Fabric MACT also included an exemption if an individual production line was coating a substrate other than a fabric for more than 90% of the time, then it would be subject to the other coating standard.

Pioneer Plastics has requested streamlining for these two standards in respect to the eleven process lines. Due to the flexibility inherent in the process to coat either a fabric

or a paper web on any process line it would be difficult to classify which standard would apply to an individual line. Pioneer has therefore requested that a single standard apply to all of the lines. Since the Fabric MACT is the most "stringent" of the two regulations with an emission reduction requirement of 97% versus 95% for the POWC, it has been selected as the applicable standard. The portion of the Fabric MACT that is less stringent is the compliance schedule. Pioneer accepts the POWC compliance schedule with a December 5, 2005 compliance date rather than the Fabric MACT compliance date of May 25, 2006.

These process lines also contain "affiliated operations" as defined in the Paper and Other Web Coating MACT. This includes mixing or dissolving of coating ingredients prior to application; coating mixing for viscosity adjustment, color tint or additive blending, or pH adjustment; cleaning of coating lines and coating line parts; handling and storage of coatings and solvent; and conveyance and treatment of wastewater. The POWC MACT also indicates in the Preamble to the Final Rule that although these operations are part of the source category they are not part of the affected source. Therefore these operations may be subject to the Organic Liquid Distribution (OLD) MACT. The operations on the non-PTE treaters are exempt because the coatings used do not meet the definition of an organic liquid as specified in the OLD MACT. The operations feeding the PTE treaters potentially meet the applicability requirements of the OLD MACT but may not have any control requirements due to tank volume or vapor pressure of the HAPs in the coatings. A leak detection program will be required for pumps, valves and sampling connections that contain organic liquids and are part of the POWC source category operations. The requirements for the storage tanks will be included in Section II.E.6 and the loading/unloading operations in Section II.E.7 of this permit.

The treaters, impregnators and coater are also subject to individual standards depending on their operation as described below:

Paper Coating (M5, M6, M7, C4)

Melamine Treaters M5, M6, and M7, in addition to applying resin coatings to paper, also apply a "polymeric coating" to a fiberglass web substrate. Paper Coater C4 is also used to apply resin coatings to paper, and also apply a "polymeric coating" to a fiberglass web substrate. The initial notification, that Pioneer has this process at its facility, was submitted to the EPA through a letter dated May 31, 2001. The VOC record keeping and reporting requirements of the New Source Performance Standard (NSPS) for Polymeric Coating of Supporting Substrates outlined in 40 C.F.R. Part 60, Subpart VVV are incorporated into this license to cover the fiberglass coating operations at the facility. The NSPS for Polymeric Coating of Supporting Substrates regulates coating processes that apply polymeric coatings to a supporting web

substrate other than paper, plastic film, metallic foil, or metal coil. Because the "VOC used" in this fiberglass coating process is less than 95 Mg (megagrams) per 12-month period, Pioneer is only subject to the record keeping and reporting requirements of 40 C.F.R. §§60.744(b), 60.747(b) and 60.747(c).

Streamlining

Pioneer accepts streamlining for VOC emission limits on the coating lines. Chapter 129 "Surface Coating Facilities" of the Department's regulations, Best Practical Treatment (BPT) requirements as established from Chapter 134 "VOC RACT", and the Printing, Coating, and Dyeing of Fabrics and Other Textiles NESHAP (Fabric MACT) (40 CFR Part 63, Subpart OOOO) are applicable. The Department has determined that by being subject to the requirements of VOC RACT and the federal Fabric MACT standards, that the requirements of Chapter 129 are being met. Therefore, only the VOC RACT and MACT standards are included in this license.

E. Miscellaneous Equipment

1. Pressroom

After the paper has been impregnated or coated, layers are cured/pressed into their final laminate form by applying heat and pressure. The papers are pressed on one of six individual presses, each of which is vented separately to the atmosphere. The pressure and heat supplied to each press promotes cross-linking within the layers to form the laminate and may also release small amounts of free organic material (VOC) that was not driven from the paper in the dryer section of the coating line.

In 1997, as part of the non-CTG VOC RACT analysis conducted pursuant to MEDEP Chapter 134, a new RACT determination was made by the Department and approved by EPA. The operation of the presses was determined to be meet RACT.

Opacity

Visible emissions shall not exceed 20% opacity on a 6-minute block average basis except for no more than (1) one (6) six-minute block average in a 1-hour period. (Chapter 101, Section 2.B.3.d)

Particulate Matter

Pioneer will comply with the requirements of MEDEP Chapter 105.

2. Routers, Table Saws, Sanders

Finished laminates are then routed, cut and sanded by the routers, table saws and sanders. Particulate emissions generated from the routers, table saws and sanders (Sander Dust)

are controlled by three roof mounted fabric filters (baghouses). The baghouses were first licensed on November 10, 1981 in Air Emission License #1996. In the Air Emission License issued on August 23, 1995, the Department made a BPT determination that requires visible emissions from the respective baghouse of each source be limited to 10% opacity on a six (6) minute block average basis, except for no more than 1 six minute block average in a one hour period.

Opacity
The requirements in MEDEP Chapter 101 §2(C) are applicable. Visible emissions from the above mentioned miscellaneous equipment with fabric filter control shall not exceed an opacity of 10% on a 6-minute block average basis except for no more than (1) one (6) six minute block average in a 1-hour period. The facility shall take corrective action if visible emissions from the baghouses exceed 5% opacity.

Particulate Matter
The requirements of MEDEP Chapter 105 are applicable.

Periodic Monitoring
Periodic monitoring shall include record keeping, including maintenance of the inspection logs of the baghouses.

3. Dust Transport System
Sander dust is transported pneumatically across the roof to a pelletizer and/or a truck loading area. Particulate emissions are controlled by a fabric filter baghouse.

Opacity
The requirements in MEDEP Chapter 101 §2(C) are applicable. Visible emissions from the above mentioned miscellaneous equipment with fabric filter control shall not exceed an opacity of 10% on a 6-minute block average basis except for no more than (1) one (6) six minute block average in a 1-hour period. The facility shall take corrective action if visible emissions from the baghouses exceed 5% opacity

Particulate Matter
The requirements of MEDEP Chapter 105 are applicable.

Periodic Monitoring
Periodic monitoring shall include record keeping, including maintenance of the inspection logs of the baghouses.

4. Solvent Degreaser

Pioneer operates a cold cleaning degreaser which is serviced by an outside contractor. The degreaser is subject to the requirements in MEDEP Chapter 130.

Periodic Monitoring

Periodic monitoring for the degreaser shall consist of record keeping including records of solvent added and removed.

5. Surface Coating Press

Pioneer operates a small surface coating press (P2) in the Build Up Section of the facility which is used to coat the surface of heated aluminum plates to produce drill board. The release aid surface coating is applied by a pneumatic air spray gun in excess of 50 gallons a year, however, VOC emissions are less than 15 lbs per day and are limited by this license to less than 1,666 lbs in any calendar month. Accordingly, this surface coating unit is subject to the "miscellaneous metal parts and products" record keeping requirements under the Department's Surface Coating regulation, Chapter 129, §7B.

Periodic Monitoring

Periodic monitoring for the drill board shall consist of record keeping including monthly records of the name of each coating and the mass of VOC used each month on the surface coating unit.

6. Storage Tanks

Pioneer owns and operates a number of storage tanks used for: 1) blending resins at the front end of the paper coating lines and in the "Specialty Resins" area of the plant; 2) raw material/finished product unloading, loading, weighing, and storage; and 3) wastewater pretreatment. Nine storage tanks have conservation vents and these tanks were subject to the Department's VOC RACT determination under MEDEP Chapter 134 as outlined in Amendment #3 to the 1995 Air Emission License. The RACT determination requires Pioneer to maintain conservation vents on these tanks and conduct six-month inspections. Tanks with conservation vents are listed in the following table:

TANK ID.	CAPACITY (GALLONS)	MATERIAL OF CONSTRUCTION	HEATING/ COOLING	YEAR INSTALLED
Tank #29 – Methanol	20,000	Mild Steel (new bottom 9/93)	N/A	1965
Tank #30 – Formaldehyde	20,000	Stainless	Heat (panel)	1965
Tank #45 – Phenolic Resin Blend	10,000	Mild Steel	N/A	1973

Tank #46 – Phenolic Resin Blend	10,000	Mild Steel	N/A	1973
Tank #47 – Phenolic Resin Blend	10,000	Mild Steel	N/A	1973
Tank #48 – Phenolic Fast Cure	10,000	Mild Steel	N/A	1973
Tank #49 – Urea Resin	10,000	Mild Steel	N/A	1973
Tank #60 – Phenolic Resin	12,500	Mild Steel	N/A	1988
Tank #66 - NPG Slurry Storage	15,000	Stainless	Heat - 2 coils	1993

Periodic Monitoring
Periodic monitoring shall consist of record keeping including records of the six-month inspections.

HAP Emissions
Pioneer has several tanks that meet the applicability requirements of the Organic Liquid Distribution MACT because they are not included as part of the affected source of another MACT regulation. This primarily affects the tanks and equipment that meet the Paper and Other Web Coating MACT source category but are classified as Ancillary operations and not included as part of the affected source. These tanks however typically do not require control because they do not meet the tank volume or organic HAP vapor pressure criteria specified in the regulation.

7. Chemical Loading/Unloading Operations:
Pioneer receives various raw materials in tank trucks and rail cars, and loads various products into tank trucks for shipment to customers.

VOC Emissions
Fugitive VOC emissions can occur from the manway hatch as samples are taken prior to unloading or as a result of vapor displacement during product loading. This process was considered in the Department's VOC RACT determination under MEDEP Chapter 134 as outlined in Amendment #3 to the 1995 Air Emission License. The RACT determination indicated that current operating practice represents RACT.

HAP Emissions
Theses activities are potentially subject to the National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline) NESHAP (40 CFR Part 63 Subpart EEEE) depending on concentration of HAPS in the material being transferred, its vapor pressure and its annual throughput. At the present time the facility does not meet

the throughput requirements that would require control. The portion of the chemical loading/unloading that involves the polyester resin production operation will be subject to the requirements on the National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing (40 CFR Part 63 Subpart FFFF).

F. Facility Emissions

Total Licensed Annual Emissions for the Facility
(used to calculate the license fee)

Equipment	PM	PM_{10}	SO_2	NO_X	CO	VOC
Boiler #4	33.0	33.0	368.0	99.0	66.0	2.0
Boiler #5/Thermal Oxidizer	52.1	52.1	385.9	103.8	262.8	131.4
Boiler #6	27.7	27.7	135.3	86.6	98.3	6.9
Boilers #7 and #8	0.7	0.7	0.4	6.8	13.7	0.4
Fire Pump	0.3	0.3	0.7	9.9	2.2	0.8
TOTALS	**113.8**	**113.8**	**890.3**	**306.1**	**443**	**141.5**

III. AIR QUALITY ANALYSIS

Pioneer Plastics Corporation previously submitted an ambient air quality analysis (as part of a Chapter 115 License Application process submitted on October 26, 1996) demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Initial Part 70 License.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

PIONEER PLASTICS CORPORATION ANDROSCOGGIN COUNTY AUBURN, MAINE A-448-70-A-A/I	) DEPARTMENTAL) FINDING OF FACT AND ORDER) PART 70 AIR EMISSION LICENSE 31

The Department hereby grants the Part 70 License A-448-70-A-A/I, pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP 115 and subject to the standard and special conditions listed below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Pioneer pursuant to the Department's preconstruction permitting requirements in Chapter 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or environmentally insignificant, as explained in the finding of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

STANDARD STATEMENTS

(1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both; [MEDEP Chapter 140]

(2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [MEDEP Chapter 140]

(3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [MEDEP Chapter 140]

(4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license; [MEDEP Chapter 140]

(5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of

establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [MEDEP Chapter 140]

(6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in the initial Part 70 Air Emission License application dated October 26, 1996 and upon information submitted by the licensee during the processing of the application.

SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
Boiler #6	40 CFR Part 60 Subpart Db	Standards of Performance Industrial-Commercial-Institutional Steam Generating Units	Applicable to steam generating units that commenced construction, modification, or reconstruction after June 19, 1984 with a maximum heat input rate greater than 100 MMBtu/hr. Boiler #6 was constructed prior to this date and has a maximum heat input capacity of 96.8 MMBtu/hr.
Boiler #8	40 CFR Part 60 Subpart Dc	Standards of Performance Small Industrial-Commercial-Institutional Steam Generating Units	Boiler #8 is not a steam generating units.

SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
Storage Tanks #27-LE4060, #29- Methanol, #30- Formaldehyde and #32 and #34 Wastewater storage tanks	40 CFR Part 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.	Applicable to volatile organic liquid storage tanks with a capacity > 75 cubic meters (19,813 gallons) that were constructed, modified, or reconstructed after July 23, 1984. The VOL storage tanks that exceed the regulated volume were not constructed, reconstructed or modified after 7/23/84.
Reactors K1 through K8	40 CFR Part 60 Subpart VV	Standards of Performance for Equipment Leaks of VOC in the SOCMI	Pioneer's resin production process units do not produce, as intermediates or final products, any of the chemicals listed in 40 C.F.R. §60.489.
Reactors K1 through K8	40 CFR Part 60 Subpart DDD	Standards for Performance for VOC Emissions from the Polymer Manufacturing Industry	Pioneer's resin production process units do not produce polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate) resins as defined in 40 C.F.R. §60.561.
Reactors K1 through K8	40 CFR Part 60 Subpart RRR	Standards of Performance for VOC Emissions from SOCMI Reactor Processes.	Pioneer's reactor processes are operated on a batch operation basis, and none of the reactors produce any of the chemicals listed in 40 C.F.R. §60.707 as either a product, co-product, by-product, or intermediate.
Boiler #5/Thermal Oxidizer	40 CFR Part 60 Subpart DDDD	Emission Guidelines for Commercial/Industrial Solid Waste Incinerators constructed before 11/30/99	Boiler #5/Thermal Oxidizer does not meet the definition of a CISWI. The combustion process of a solid waste does not occur in a distinct operating unit and the unit is equipped with heat recovery.
Reactors K1 through K8	40 CFR Part 63 Subparts F, G, H, and I	NESHAP for Source Categories (MACT Standards) Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry	Pioneer's manufacturing process units do not produce as a primary product any of the chemicals listed in Table 1 in 40 C.F.R. Part 63, Subpart F.
Reactors K1 through K8	40 CFR Part 63 Subpart U	NESHAP for Source Categories (MACT Standards Group I Polymers and Resins)	Pioneer's resin production reactors do not manufacture any of the designated "elastomer" resins designated in 40 C.F.R. §63.482.

SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
Reactors K1 through K8	40 CFR Part 63 Subpart W	NESHAP for Source Categories (MACT Standards Group II Polymers and Resins Epoxy Resins Production and Non-Nylon Polyamides Production)	Pioneer's resin production reactors do not manufacture "basic liquid epoxy resins" (BLR) or "wet strength resins" (WSR) as defined in 40 C.F.R. §63.522.
Reactors K1 through K8	40 CFR Part 63 Subpart YY	NESHAP for Source Categories (Generic MACT Standards for Acetal Resins Production)	Pioneer's resin production reactors do not manufacture acetal resins as defined in 40 C.F.R. §63.1103(a)(2).
Reactors K1 through K8	40 CFR Part 63 Subpart JJJ	NESHAPs for Source Categories (MACT Standards Group IV Polymers and Resins)	Pioneer's resin production reactors do not manufacture "thermoplastic products" or resins as defined in 40 C.F.R. §63.1312.
K1 and K2	40 C.F.R. Part 63, Subpart OOO	Portions of the NESHAP for Source Categories (MACT Standards Group III Polymers and Resins) Amino/Phenolic Resins Production: 1. New Source Provisions	Pioneer's Amino/Phenolic Resin Process Units are not classified as a new source.
K3	40 C.F.R. Part 63, Subpart OOO	NESHAP for Source Categories (MACT Standards Group III Polymers and Resins) Amino/Phenolic Resins Production:	Since the production of an amino/phenolic resin does not account for the greatest percent of the annual design capacity of the unit on a mass basis the Amino/Phenolic MACT does not apply.
Reactors K1 through K8	40 CFR Part 63 Subpart PPP	NESHAP for Source Categories (MACT Standards for Polyether Polyols Production)	Pioneer's resin production reactors do not manufacture "polyether polyols" per 40 C.F.R. §63.1423.
Onan Gas Fired Back-up Generator Cummins Diesel Back-up Generator Cummins Diesel Fire Pump	Proposed 40 CFR Part 63 Subpart ZZZZ	NESHAP for Stationary Reciprocating Internal Combustion Engines	Pioneer does not operate a stationary reciprocating internal combustion engine that has nameplate rating of greater than 500 brake horsepower
Miscellaneous,Coating Operations	Proposed as 40 CFR Part 63 Subpart HHHHH	NESHAP for Miscellaneous Coating Manufacturing Processes	Pioneer does not meet the applicability criteria or is exempt due to being subject to other MACTs

SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
Boiler #5/ Thermal Oxidizer	MEDEP Chapter 104	Incinerator Particulate Emission Standard	The thermal oxidizer, used for VOC control, does not meet the definition of incinerator per Chapter 100.

[MEDEP Chapter 140]

(7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or

D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[MEDEP Chapter 140]

(8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license. [MEDEP Chapter 140]

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA §347-C);

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140; [MEDEP Chapter 140]

(3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; [MEDEP Chapter 140]
Enforceable by State-only

(4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.

(5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; [MEDEP Chapter 140]
Enforceable by State-only

(6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;
[MEDEP Chapter 140]

(7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [MEDEP Chapter 140]

(8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

A. perform stack testing under circumstances representative of the facility's normal process and operating conditions:

1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;

2. to demonstrate compliance with the applicable emission standards; or

3. pursuant to any other requirement of this license to perform stack testing.

B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

C. submit a written report to the Department within thirty (30) days from date of test completion.

[MEDEP Chapter 140] **Enforceable by State-only**

(9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[MEDEP Chapter 140] **Enforceable by State-only**

(10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

C. All other deviations shall be reported to the Department in the facility's semiannual report.

[MEDEP Chapter 140]

(11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [MEDEP Chapter 140]

(12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [MEDEP Chapter 140]

(13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:

(a) The identification of each term or condition of the Part 70 license that is the basis of the certification;

(b) The compliance status;

(c) Whether compliance was continuous or intermittent;

(d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and

(e) Such other facts as the Department may require to determine the compliance status of the source;

[MEDEP Chapter 140]

SPECIAL CONDITIONS

Fuel Burning Equipment

(14) A. Boiler #4

a. Boiler #4 shall not exceed a NOx limit of 100 tons/year (12 month rolling total) and shall record fuel fired and NOx emissions on a monthly basis. The ton per year NOx emission limit shall be based on fuel use and EPA's Compilation of Air Pollutant Emission Factors (AP-42) and/or stack test data if available. If Pioneer combusts more than 350,000 gallons in any calendar year, then a NOx and PM emission stack test shall be performed by July 1 of the following year. [MEDEP Chapter 138]

b. The sulfur content of the fuel oil fired in Boiler #4 shall not exceed 2.0% by weight, [MEDEP Chapter 106] during normal operation. When Boiler #6 is burning #4 fuel in place of natural gas during the period of May 1 through September 30, Boiler #4 will be required to burn #4 fuel oil with a sulfur content not to exceed 0.7% by weight.

c. Pioneer shall perform an annual tune-up on Boiler #4, which includes the following:

1. A tune-up procedure file must be kept on-site and made available to the Department upon request;

2. An oxygen/carbon monoxide curve or an oxygen/smoke curve must be kept on file;
3. Once the optimum excess oxygen setting has been determined, the owner or operator of a source must periodically verify that the setting remains at that value; and
4. If the minimum oxygen level found is substantially higher than the value provided by the combustion unit manufacturer, the owner or operator must improve the fuel and air mixing, thereby allowing operation with less air. [MEDEP Chapter 138]

d. Boiler #4 shall not exceed the following emission limitations:

POLLUTANT	LB/MMBTU	ORIGIN AND AUTHORITY	ENFORCEABILITY
PM	0.20	MEDEP, Chapter 103, §2(A)(1)	Federally enforceable

POLLUTANT	LB/HR	ORIGIN AND AUTHORITY	ENFORCEABILITY
PM	11.1	MEDEP Chapter 140, BPT	Enforceable by State-only
PM_{10}	11.1	MEDEP Chapter 140, BPT	Enforceable by State-only
SO_2	123.8	MEDEP Chapter 140, BPT	Enforceable by State-only
NO_x	33.3 *	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	22.2	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	0.6	MEDEP Chapter 140, BPT	Enforceable by State-only

* NOx emissions when firing #4 fuel oil shall not exceed 12.1 lb/hr based on a ratio of AP-42 emission factors.

e. Visible emissions from Boiler #4 (through the combined stack #1 for Boilers #4 and #6 and the Thermal Oxidizer) shall not exceed 30% opacity recorded as six (6) minute block averages, except for no more than two (2) six (6) minute block averages in a 3-hour block period.

B. Boiler #4 is subject to the Industrial/Commercial/Institutional Boilers, and Process Heaters National Emission Standards for Hazardous Air Pollutants (NESHAPs) Requirements 40 CFR Part 63, Subpart DDDDD.

The Boiler NESHAP was proposed on January 13, 2003 has the potential to apply to the Boiler #4. The final rule is expected in early 2004 with a compliance date of early 2007.

(15) A. Boiler #6

a. The sulfur content of the #6 fuel oil fired in Boiler #6 shall not exceed 0.7% by weight. [MEDEP Chapter 140, BPT]

b. Pioneer shall have the flexibility to burn #4 fuel oil with a sulfur content not to exceed 0.7% by weight in place of natural gas. Under this scenario, all other boilers are required to burn #4 fuel oil with a maximum sulfur content of 0.7% by weight.

c. Boiler #6 shall not exceed the following emission limitations while firing fuel oil:

POLLUTANT	LB/MMBTU	ORIGIN AND AUTHORITY	ENFORCEABILITY
PM	0.15	MEDEP, Chapter 103, §4	Federally enforceable
NOx	0.47	MEDEP Chapter 140, BPT	Enforceable by State-only

POLLUTANT	LB/HR	ORIGIN AND AUTHORITY	ENFORCEABILITY
PM	14.5	MEDEP Chapter 140, BPT	Enforceable by State-only
PM10	14.5	MEDEP Chapter 140, BPT	Enforceable by State-only
SO2	70.7	MEDEP Chapter 140, BPT	Enforceable by State-only
NOx	45.5 *	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	16.5	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	1.0	MEDEP Chapter 140, BPT	Enforceable by State-only

* NOx emissions when firing #4 fuel oil shall not exceed 16.5 lb/hr based on a ratio of AP-42 emission factors.

d. Pioneer shall burn natural gas within three (3) days when gas is available at the interruptible gas rate from May 1 through September 30, except where gas cannot be used due to maintenance or construction activities or during operations in accordance with Condition (15)b. Pioneer will provide written notice to the Department when maintenance or construction activities interfere with the burning of natural gas.

e. Pioneer shall monitor the gas prices monthly and document the dates upon which gas is available at the interruptible rate for the months of March through June and no longer available at the interruptible rate for the months of September through December. Pioneer shall keep sufficient records to document compliance with this condition. These records shall be maintained for at least six (6) years and be made available to the Department and EPA upon request. [MEDEP Chapter 138]

f. Boiler #6 shall not exceed the following emission limitations while firing natural gas:

POLLUTANT	LB/MMBTU	ORIGIN AND AUTHORITY	ENFORCEABILITY
PM	0.02	MEDEP, Chapter 103, §4	Federally enforceable
NOx	0.15	MEDEP Chapter 140, BPT	Enforceable by State-only

POLLUTANT	LB/HR	ORIGIN AND AUTHORITY	ENFORCEABILITY
PM	1.9	MEDEP Chapter 140, BPT	Enforceable by State-only
PM10	1.9	MEDEP Chapter 140, BPT	Enforceable by State-only

SO2	1.0	MEDEP Chapter 140, BPT	Enforceable by State-only
NOx	14.5	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	16.5	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	1.0	MEDEP Chapter 140, BPT	Enforceable by State-only

g. Visible emissions from Boiler #6 (through the combined stack #1 for Boilers #4, #6, and the Thermal Oxidizer) shall not exceed 30% opacity recorded as six (6) minute block averages, except for no more than two (2) six (6) minute block averages in a 3-hour block period. [MEDEP Chapter 140, BPT]

h. Consumption of natural gas, #6 fuel oil, and #4 fuel oil in Boiler #6 during any 12 month rolling total shall not result in a NOx emission exceeding a limit of 86.4 tons per year. This emission calculation shall be determined by purchase records and AP-42 emission factors or prior NOx stack testing data if available and will be maintained on a monthly basis. [MEDEP Chapter 140, BPT]

i. Compliance with the particulate matter emission limits (lb/MMBtu and lb/hr, for fuel oil firing only) shall be based on a stack test conducted in accordance with the appropriate EPA test method (40 CFR, Part 60, Appendix A or another method approved by the Department) by July 31, 2004 and every other year thereafter.

Pioneer shall submit a report of the required stack testing, including a description of the test procedures, test results, and source operations and submit the report to the Department within 30 days of the test. [MEDEP Chapter 140, BPT]

j. Compliance with the NOx emission limits (lb/MMBtu and lb/hr, for fuel oil firing only) shall be based on an annual stack test conducted in accordance with the appropriate EPA test methods (40 CFR, Part 60, Appendix A) by July 31st every year thereafter.

Pioneer shall submit a report of the required stack testing, including a description of the test procedures, test results, and source operations and submit the report to the Department within 30 days of the test. [MEDEP Chapter 140, BPT and Chapter 117]

B. Boiler #6 is subject to the Industrial/Commercial/Institutional Boilers, and Process Heaters National Emission Standards for Hazardous Air Pollutants (NESHAPs) Requirements 40 CFR Part 63, Subpart DDDDD.

The Boiler NESHAP was proposed on January 13, 2003 has the potential to apply to the Boiler #6. The final rule is expected in early 2004 with a compliance date of early 2007.

(16) A. Boiler #8

a. Boiler #8 shall fire natural gas only, except for any related pilot light which may fire propane gas. [MEDEP Chapter 140, BPT]

b. Boiler #8 shall not exceed the following emission limitations:

POLLUTANT	LB/MMBTU	ORIGIN AND AUTHORITY	ENFORCEABILITY
PM	0.02	MEDEP, Chapter 140, BPT	Enforceable by State-only

POLLUTANT	LB/HR	ORIGIN AND AUTHORITY	ENFORCEABILITY
PM	0.10	MEDEP Chapter 140, BPT	Enforceable by State-only
PM10	0.10	MEDEP Chapter 140, BPT	Enforceable by State-only
SO2	0.05	MEDEP Chapter 140, BPT	Enforceable by State-only
NOx	1.0	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	2.0	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	0.05	MEDEP Chapter 140, BPT	Enforceable by State-only

c. Visible emissions from Boiler #8 (through the combined stack #2 for Boilers #7 and #8) shall not exceed 10% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period. [MEDEP Chapter 101]

B. Boiler #8 may be subject to Industrial/Commercial/Institutional Boilers, and Process Heaters National Emission Standards for Hazardous Air Pollutants (NESHAPs) Requirements 40 CFR Part 63, Subpart DDDDD.

The Boiler NESHAP was proposed on January 13, 2003 has the potential to apply to the Boiler #8. The final rule is expected in early 2004 with a compliance date of early 2007.

(17) Diesel Engine (Fire Pump)

a. Pioneer shall limit NOx emissions from the Diesel Engine to less than 10 tons per year and shall not use diesel fuel in excess of 0.05% sulfur content by weight. [MEDEP Chapter 138]

b. Pioneer shall not operate the Diesel Engine for more than 2,292 hours in any 12-month rolling period. To provide a means for determining compliance with this limit, Pioneer shall either maintain a meter on the engine which automatically displays cumulative operating time, or manually record periods of operation in a logbook. [MEDEP Chapter 138]

c. Visible emissions from the Fire Pump shall not exceed 30% opacity on a six minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period. [MEDEP Chapter 140]

Fuel Burning/Pollution Control Equipment

(18) A. Thermal Oxidizer (Boiler #5)

Operating as a Boiler:

a. The sulfur content of the fuel oil fired in the Thermal Oxidizer shall not exceed 2.0% by weight. [MEDEP Chapter 106] during normal operation. When Boiler #6 is burning #4 fuel in place of natural gas during the period of May 1 through September 30, Boiler #4 will be required to burn #4 fuel oil with a sulfur content not to exceed 0.7% by weight.

b. The Thermal Oxidizer shall not exceed the following emission limitations:

POLLUTANT	LB/HR	ORIGIN AND AUTHORITY	ENFORCEABILITY
PM	11.9	MEDEP Chapter 140, BPT	Enforceable by State-only
PM_{10}	11.9	MEDEP Chapter 140, BPT	Enforceable by State-only
SO_2	88.1	MEDEP Chapter 140, BPT	Enforceable by State-only
NO_x	23.7 *	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	60.0	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	30.0	MEDEP Chapter 140, BPT	Enforceable by State-only

* NOx emissions when firing #4 fuel oil shall not exceed 8.6 lb/hr based on a ratio of AP-42 emission factors.

c. Particulate emissions shall not exceed 0.20 lb/MMBtu per Chapter 103 of the MEDEP regulations. [MEDEP Chapter 103]

d. Visible emissions from the Thermal Oxidizer, through the combined stack with Boilers #4 and #6, shall not exceed 30% opacity recorded as six (6) minute block averages, except for no more than two (2) six (6) minute block averages in a 3-hour block period. [MEDEP Chapter 140]

e. Compliance with the NOx and particulate matter emission limits shall be based on a stack test conducted in accordance with the appropriate EPA test method (40 CFR, Part 60, Appendix A or another method approved by the Department) by July 31, 2004 and by July 31st every year thereafter.

Pioneer shall submit a report of the required stack testing, including a description of the test procedures, test results, and source operations and submit the report to the Department within 30 days of the test. [MEDEP Chapter 140, BPT]

f. Pioneer shall perform annual internal inspections of the ductwork that delivers emissions to the Thermal Oxidizer, as well as the burner components in the Thermal Oxidizer in order to maintain good combustion efficiency. Records of these inspections shall be

maintained for at least six (6) years and be made available to the Department upon request. [MEDEP Chapter 138]

B. Boiler #5 is subject to the Industrial/Commercial/Institutional Boilers, and Process Heaters National Emission Standards for Hazardous Air Pollutants (NESHAPs) Requirements 40 CFR Part 63, Subpart DDDDD.

The Boiler NESHAP was proposed on January 13, 2003 has the potential to apply to the Boiler #5. The final rule is expected in early 2004 with a compliance date of early 2007.

Operating as a Pollution Control Device for the Control of VOCs and HAPs:

C. At all times that P1, P4, P5, and C4 are operating as coaters, impregnators or treaters, Pioneer shall vent VOC emissions to the Thermal Oxidizer by means of a certified Permanent and Total Enclosure (PTE) Capture System [MEDEP Chapters 123 and 126] and shall:

1. Maintain a minimum incinerator combustion temperature of 1250°F in the Thermal Oxidizer combustion chamber [MEDEP Chapter 140 BPT]. A streamlined limit that is higher than this may be established based on the performance testing required by the MACT standards also applicable to this unit. ;
2. Periodically monitor the exhaust gas temperature in the Thermal Oxidizer and record at least one reading every 15 minutes. Four equally spaced readings are required to constitute a valid hour of data. Valid data must be collected from at least 90% of the hours during which the process operates. [MEDEP Chapter 123 and 40 CFR 60.4364 (a)(2)];
3. a. Limit VOC emissions after destruction in the Thermal Oxidizer to a rate of 4.8 pounds of VOC emitted per gallon of solids applied to the substrate verified using EPA test methods 24 and 25A (40 CFR, Part 60, Appendix A, Methods 24 and 25A) [MEDEP Chapter 123]; or

   b. Limit VOC emissions such that total VOC emissions from P1, P4, P5, and C4 are controlled by 95%. Compliance with the 95% overall reduction of total VOC emissions shall be based on a demonstration that the PTE Capture System meets the appropriate specifications (Chapter 126, Appendix A, Procedure T) in conjunction with a destruction efficiency test on the Thermal Oxidizer once every two years using EPA test methods 25 or 25A (40 CFR, Part 60, Appendix A, Methods 25, 25A) [MEDEP Chapter 123 and Chapter 140 BPT].

D. Boiler #5/Thermal Oxidizer is subject to the Amino/Phenolic Resin Production National Emission Standards for Hazardous Air Pollutants (NESHAPs) Requirements 40 C.F.R. Part 63, Subpart OOO.

a. Boiler # 5/Thermal Oxidizer must meet the control devices requirements specified in 40 CFR Part 63 Subpart OOO per 40 CFR §63.1415(b).

b. Pioneer shall comply with 40 C.F.R. 63 Subpart UU (Generic MACT equipment leak rule), control level 2 for all equipment (defined in 40 C.F.R. §63.1402) that contains or contacts ≥5% HAPs and operates at ≥300 hours a year.

c. Closed vent systems, control devices, and fuel gas systems must also meet the requirements of 40 CFR Part 63, Subpart SS (National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process).

E. Boiler #5/Thermal Oxidizer is subject to the Streamlined Requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paper and Other Web Coating Requirements 40 C.F.R. Part 63, Subpart JJJJ and the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Printing, Coating and Dyeing of Fabrics and Other Textiles Requirements 40 C.F.R. Part 63, Subpart FFFF. OOOO

a. Boiler 5/Thermal Oxidizer must meet the performance testing and operation limits specified in 40 CFR Part 63.4363 and the installation, operation and maintenance requirements specified in 40 CFR 63.4364.

Process Equipment

(19) A. Melamine and Urea (Amino) Resin Production: Reactors K1 and K2

a. Visible emissions from K1 and K2 shall be limited to 20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period [MEDEP Chapter 140]

b. Particulate emissions from K1 and K2 shall be limited to the applicable limitation from Table 105A or the formula in Section 4 of Chapter 105. [MEDEP Chapter 105]

B. Melamine and Urea (Amino) Resin Production, Reactors K1 and K2 are subject to the Amino/Phenolic Resin Production National Emission Standards for Hazardous Air Pollutants (NESHAPs) Requirements 40 C.F.R. Part 63, Subpart OOO.

The Amino/Phenolic Resin Production NESHAP promulgated on January 20, 2000 (40 C.F.R. Part 63, Subpart OOO) applies to Pioneer's melamine and urea resin production operations. Compliance with the emission standards was required by January 20, 2003. Pioneer, however, was granted a one year compliance extension which postponed the compliance date to January 20, 2004.

a. Pioneer filed a pre-compliance report on January 18, 2002 per 40 C.F.R. § 63.1417(d).

b. Pioneer will comply with an applicable HAP emission standard [on January 20, 2004] as described below:

EMISSION POINT	APPLICABILITY	STANDARD	CITATION
Aggregate Batch Vent Stream on Reactors K1 and K2, Fiberglass Tanks #1 and #2, and Weigh Tank #2	Applies to all aggregate batch process vents	83% reduction over the batch cycle using a control device	40 C.F.R. §63.1408(a)(2)(ii)
Heat Exchange Systems on K1 and K2	The condition in 40 C.F.R. §63.1409(a)(1) is met and therefore Pioneer is not subject to the monitoring requirements for leaks of its heat exchange.	Monitor for leaks per the generic MACT Equipment Leak Provisions in 40 C.F.R. Part 63, Subpart UU.	40 C.F.R. §63.1409(a)(1-6)
Equipment Leaks	The equipment contains or contacts >5 weight % organic HAP and operates >300 hours per.	Comply with 40 C.F.R. 63 Subpart UU (Generic MACT equipment leak rule), control level 2 for all equipment (defined in 40 C.F.R. §63.1402) that contains or contacts >5% HAPs and operates at >300 hours a year.	40 C.F.R. §63.1410

c. Pioneer shall develop a Start-up, Shutdown , Malfunction Plan prior to the compliance date of January 20, 2004 per 40 CFR §63.6(e)(3) and Table 1 of 40 CFR Part 63 Subpart OOO.

d. Pioneer shall conduct an initial performance test on the thermal oxidizer to determine the minimum parameter monitoring level per 40 CFR §63.1413(a)(1)(i).

e. Pioneer shall submit a site specific test plan 90 days prior to the performance test referenced in (20)c above per 40 CFR §63.1417(h)(2).

f. Pioneer shall provide notification to the Administrator 30 days prior to the planned performance test referenced in (20)c. above per 40 CFR §63.1417(h)(3)

g. Pioneer shall file a Notification of Compliance Status Report by June 20, 2004, per 40 C.F.R. §63.1417(e) detailing compliance methods.

h. Pioneer shall file Periodic Reports semiannually, no later than 60 days after the end of the six-month period, per 40 C.F.R. §63.1417(f). The first Periodic Report is due by February 20, 2005.

i. Pioneer shall meet the compliance demonstration procedures per 40 C.F.R. §63.1413. [Owners of "large control devices" (that control emission points with total emissions of 10 tpy or more before control) must conduct a performance test no later than June 20, 2004. See 40 C.F.R. §63.1413(a)(2)(ii)(C).]

j. Pioneer shall keep records as indicated in 40 C.F.R. §63.1416:

(20) A. Phenolic Resin Blending: Reactor K3

a. The following conditions are to meet VOC RACT requirements:

1. At all times that K3 is producing urea resins, blending phenolic resins, or blending LE-4060 with Acetone, Pioneer shall vent the emissions from the main outlet vent on K3 through the vapor condenser. The temperature of the coolant on the inlet side of the K3 condenser shall be maintained below 100 degrees Fahrenheit while the reactor is in operation. [MEDEP Chapter 134]

2. At all times that the K3 is not venting through the thermal oxidizer, Pioneer shall monitor and record in a log the temperature of the coolant on the inlet side of the vapor condenser every 6 hours. Pioneer shall maintain such records for a minimum of 6 years and they shall be submitted to the Bureau of Air Quality upon request. [MEDEP Chapter 134]

b. Visible emissions from K3 shall be limited to 20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period [MEDEP Chapter 140]

c. Particulate emissions from K3 shall be limited to the applicable limitation from Table 105A or the formula in Section 4 of Chapter 105. [MEDEP Chapter 105]

d. When blending phenolic resins with a methanol/VOC/phenolic extender blend and when hot cutting products with a VOC/HAP based solvent in the K3 reactor, Pioneer shall capture and duct VOC/HAP emissions from the K3 reactor to the thermal oxidizer. The thermal oxidizer will be operated to achieve a minimum VOC/HAP destruction efficiency of 95 percent. [MEDEP Chapter 134]

e. Pioneer is licensed to operate the K3 reactor and the associated paper impregnating and treating operations down-stream of the K3 reactor under four operating scenarios to maintain operational flexibility; the operating scenarios are...

1. Blend the phenolic extender material with acetone and resins, on-site, in the K3 reactor;
2. Blend the phenolic extender with methanol and resins, on-site, in the K3 reactor;
3. Purchase from an external supplier a phenolic extender/phenolic resin blend and a UF resin/phenolic extender that will include methanol in the purchased phenolic extender blend; and
4 Use phenolic resins that will not require the addition of the phenolic extender/solvent solution. [MEDEP Chapter 140]

f. Pioneer shall maintain chemical use records for the flexible operating scenarios. [MEDEP Chapter 140]

g. Pioneer will calculate VOC emissions on a monthly basis for this process modification in order to demonstrate that the VOC emission (of methanol) from the operating scenarios 2 and 3 do not exceed an emissions increase of 30 tons per year for VOC emissions. The following assumptions are applied when calculating emissions:

1. Zero increase in VOC emissions under operating scenario 1 (Blend phenolic extender material with acetone, not a VOC or HAP.
2. Flexible operating scenario 2 and 3 calculations will track VOC emissions of only methanol (Blend the phenolic extender material with methanol)
3. Operating scenario 4 is not a modification and represents a currently licensed activity (coating with phenolic resins);
4. 100% volatilization of methanol
5. 100% capture of methanol emissions from both the K3 reactor and from the permanent total enclosures (PTE) around the paper impregnators P1, P4, P5, and C4 where the phenolic coating will be applied; and
6. 95% destruction of VOC/HAP in the thermal oxidizer (based on previous performance tests).

(b) At all times that K4, K5, K6, and K8 are blending polyester resins, Pioneer shall vent the emissions from the main outlet vent on each reactor through the separating column and vapor condenser which shall be operated to maximize the condensation of any emissions. The temperature of the coolant on the inlet side of the vapor condensers to K4, K5, K6, and K8 shall be maintained below 100 degrees Fahrenheit while the reactors are blending polyester resins. Pioneer shall record the date and length of time in minutes when each reactor is blending polyester resins. [MEDEP Chapter 134]

At all times that K4, K5, K6, and K8 are blending polyester resins, Pioneer shall monitor and record in a log the temperature of the coolant on the inlet side of the vapor condensers to K4, K5, K6, and K8, every 6 hours. Pioneer shall maintain such records for a minimum of 6 years and they shall be submitted to the Bureau of Air Quality upon request. [MEDEP Chapter 134]

2. Pioneer shall maintain a log detailing the period of time in hours and minutes, that such emissions receive control by the use of the wet scrubber system. Pioneer shall maintain such records for a minimum of 6 years and they shall be submitted to the Bureau of Air Quality upon request. [MEDEP Chapter 134]

b. Visible emissions from K4, K5, K6, K7 and K8 shall be limited to 20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period [MEDEP Chapter 140, BPT]

c. Particulate emissions from K4, K5, K6, K7 and K8 shall be limited to the applicable limitation from Table 105A or the formula in Section 4 of Chapter 105. [MEDEP Chapter 105]

B. Polyester Resin Reactors K4, K5, K6, K7, and K8 are subject to the MON Requirements 40 C.F.R. Part 63, Subpart FFFF

a. Pioneer's polyester reactors K4, K5, K6, K7, and K8 are likely to be subject to the Miscellaneous Organic Chemical Production Processes National Emission Standards for Hazardous Air Pollutants (MON) because this MACT rule includes, among other source subcategories, Alkyd Resins Production and Polyester Resins Production, [40 C.F.R. Part 63, Subpart FFFF].The MON rule was finalized on November 10, 2003 with a compliance date of November 10, 2006.

(22) A. Paper Coaters M1, M3, M4, M5, M6, M7 and the Pilot Treater

a. At all times that M1, M3, M4, M5, M6, M7 and the Pilot Treater are on-line, Pioneer shall not exceed a coating limit of 2.9 pounds of VOC per gallon of coating (excluding water and negligibly reactive VOCs as defined in Chapter 100) verified using EPA Method 24 from 40 CFR Part 60, Appendix A or a method acceptable to the Department. Any averaging of emission limits to meet this emission limit must comply with EPA's Emission Trading Policy Statement published on 12/4/86 in the Federal Register and must be approved by DEP and EPA. [MEDEP Chapter 123]

b. Pioneer shall keep the following records on site for all coating lines on a daily basis if applicable unless the conditions as described in Special License Condition (23)(A)(c). below are met:

1. Coating line number;
2. Time period (hours of operation);
3. Coating identification number;
4. Amount of coating used;
5. Diluent identification number; and
6. Amount of diluent used.

Pioneer shall also record the information in numbers 5 and 6 above for any diluents and solvents used for clean-up operations. [MEDEP Chapter 123]

c. If Pioneer certifies that all of the coatings used on lines M1, M3, M4, M5, M6, M7 and the Pilot Treater have an as applied VOC content less than 2.9 pounds per gallon of coating (excluding water and exempt compounds), then Pioneer need only keep the following records on a monthly basis for these lines:

1. Time period (hours of operation);
2. Coating identification number and amount of VOC containing constituents used;
3. Diluent identification number and amount of diluent used (excluding water and exempt compounds);
4. Mass of VOC per volume of each coating, excluding water and exempt compounds, as applied;
5. Total VOCs emitted; and
6. Certification stating all compounds used at the source have an as applied VOC content less than 2.9 pounds of VOC per gallon of coating, excluding water and exempt compounds. [MEDEP Chapter 123]

d. Copies of all the records specified above shall be kept at the source for a minimum period of six years. [MEDEP Chapter 123]

e. Pioneer shall submit revised information to the Department whenever it purchases or uses a new coating, diluent or solvent. Information to be provided is to include the parameters specified in the MEDEP Chapter 123 Section 3.5.B.

f. When engaging in cleanup activities on the melamine treaters (M1, M3, M4, M5, M6, M7 and the Pilot Treater), Pioneer shall limit the VOC content of its cleaning solutions to 50 % by volume, except for the use of 500 pounds of cleaning solutions per year which may contain greater than 50% by volume VOC. [MEDEP Chapter 134]

Pioneer shall keep records of the VOC emissions per year from cleanup activities on the melamine treaters (M1, M3, M4, M5, M6, and M7), and also records of the pounds per year of cleaning solutions which were used on the melamine treaters with a VOC content greater than 50% by volume. [MEDEP Chapter 134]

B. Paper Coaters P1, P4, P5 and C4

a. At all times that P1, P4, P5 and C4 are operating as coaters, impregnators or treaters, Pioneer shall vent VOC emissions to the Thermal Oxidizer by means of a certified Permanent and Total Enclosure (PTE) Capture System and destroy VOC emissions pursuant to Special License Condition # (19)(C) above. [MEDEP Chapter 123]

b. The Permanent Total Enclosures (PTE) on P1, P4, and P5 will have documented inspections semiannually. These inspection reports will be submitted with the semiannual report required by this permit.

An evaluation will also be conducted of the PTE Capture System to ensure that the system meets the appropriate specifications (Chapter 126 Appendix A, Procedure T of the Maine regulations) every two years in conjunction with the destruction efficiency test on the Thermal Oxidizer.

c. Pioneer shall keep the following records on site for all coating lines on a daily basis:

1. Coating line number;
2. Time period (hours of operation);
3. Coating identification number;
4. Amount of coating used;
5. Diluent identification number; and

6. Amount of diluent used.

Pioneer shall also record the information in numbers 5 and 6 above for any diluents and solvents used for clean-up operations. [MEDEP Chapter 123]

d. Copies of all the records specified above shall be kept at the source for a minimum period of six years. [MEDEP Chapter 123]

e. Pioneer shall submit revised information to the Department whenever it purchases or uses a new coating, diluent or solvent. Information to be provided is to include the parameters specified in the MEDEP Chapter 123 Section 3.5.B.

C. New Source Performance Standard (NSPS) Requirements for Polymeric Coating of Supporting Substrates 40 C.F.R. Part 60, Subpart VVV:

a. When Treaters C4, M5, M6, and M7 are applying a polymer coating to a fiberglass substrate, Pioneer shall:

1. make semiannual estimates of the projected annual amount of VOC to be used for the manufacture of polymeric coated fiberglass substrate at the facility in that year [40 C.F.R. §60.744(b)(1)];

2. record semiannual estimates of projected VOC use and actual 12-month VOC use [40 C.F.R. §60.747(c)(1)];

3. maintain records of actual VOC use [40 C.F.R. §60.744(b)(2)];

4. report to EPA and DEP the first semiannual estimate in which projected annual VOC use exceeds 95 Mg (megagrams) per 12-month period [40 C.F.R. §60.747(c)(2)]; and

5. report to EPA and DEP the first 12-month period in which actual VOC use exceeds 95 Mg per 12-month period [40 C.F.R. §60.747(c)(3)].

D. Paper Coaters, Treaters, Impregnators M1, M3, M4, M5, M6, M7,Pilot Treater, P1, P4, P5, and C4 are potentially subject to either the Paper and Other Web Coating NESHAP 40 C.F.R. Part 63, Subpart JJJJ or the Printing, Coating and Dyeing of Fabrics NESHAP 40 C.F.R. Part 63, Subpart OOOO.

To allow for more flexibility with the process, the facility has accepted streamlined requirements. The streamlined requirements include the standards expressed in the Printing, Coating and Dyeing of Fabrics NESHAP 40 C.F.R. Part 63, Subpart OOOO and will be implemented following the Paper and Other Web Coating NESHAP 40 C.F.R. Part 63, Subpart JJJJ timelines. The following conditions shall be met:

a. The compliance date shall be December 5, 2005.

b. An Initial Notification in accordance with 40 CFR 63.4310 (b) and 63.9(b) shall be submitted no later than May 29, 2004.

c. An Initial Notification of Compliance Status per 40 CFR 63.4310(c) shall be submitted.

d. The facility shall meet the emission limitations as specified in 40 CFR 63.4300 (a)(1) though (4).

e. The facility shall develop a work practice plan in accordance with 40 CFR 63.4293.

f. The facility shall develop a Start-up, Shut-down and Malfunction Plan in accordance with 40 CFR 63.4300 (c).

g. If a control device is used, the facility shall meet the operating limits specified in 40 CFR 63.4292 and shall conduct a Performance Test as required by 40 CFR 63.4360.

h. The facility shall comply with the continuous compliance requirements of 40 CFR 63.4352 and the continuous monitoring requirements of 40 CFR 63.4364.

i. The facility shall prepare and submit semiannual compliance reports in accordance with MEDEP Chapter 140.

j. Recordkeeping shall include documents specified in 40 CFR 63.4312.

Miscellaneous Equipment

(23) Pressroom

a. Visible emissions from the laminate presses shall be limited to:

The presses shall be subject to 20% opacity on a 6-minute block average basis except for no more than (1) one (6) six minute block average in a 1-hour period. [MEDEP Chapter 140, BPT]

(24) Routers, Table Saws, and Sanders

a. Visible emissions from each of the respective routing, cutting and sanding baghouses shall be limited to 10% opacity on a 6-minute block average basis except for no more than (1) one (6) six minute block average in a 1-hour period. The facility shall take corrective action if visible emissions from the baghouses exceed 5% opacity [MEDEP Chapter 140, BPT]

b. Particulate emissions from the routers, table saws and sanders shall be limited to the applicable limitation from Table 105A or the formula in Section 4 of Chapter 105. [MEDEP Chapter 105]

c. In order to document maintenance of the baghouses, Pioneer shall keep a maintenance log recording the date and location of all bag failures. The log shall be maintained for at least six years and available to the Department upon request. [MEDEP Chapter 140, BPT]

(25) Dust Transporter System

a. Visible emissions from the Dust Transport System Baghouse shall be limited to 10% Opacity on a 6-minute block average basis except for no more than (1) one (6) six minute block average in a 1-hour period. The facility shall take corrective action if visible emissions from the baghouses exceed 5% opacity [MEDEP Chapter 140, BPT]

b. Particulate emissions from the Dust Transport System shall be limited to the applicable limitation from Table 105A or the formula in Section 4 of Chapter 105. [MEDEP Chapter 105]

c. In order to document maintenance of the baghouses, Pioneer shall keep a maintenance log recording the date and location of all bag failures. The log shall be maintained for at least six years and available to the Department upon request. [MEDEP Chapter 140, BPT]

(26) Parts Washers

Parts washers that use a solvent degreaser containing greater then 1% VOC are subject to the operational and record keeping requirements of MEDEP Chapter 130 which include, but are not limited to, the following:

A. Pioneer shall keep records of the amount of solvent added to each parts washer. [MEDEP Chapter 130]

B. Pioneer shall equip each cold cleaning degreaser unit with a cover that is easily operated with one hand if [MEDEP Chapter 130]:
   1. the solvent vapor pressure is greater than 15 millimeters of mercury measured at 100 °F by ASTM D323-89; or,
   2. the solvent is agitated; or,
   3. the solvent is heated.

C. Pioneer shall attach a permanent conspicuous label to each cold cleaning degreaser unit summarizing the following operational standards [MEDEP Chapter 130]:
   1. Close the covers on all solvent degreasing tanks when the tanks are not in use;
   2. Drain the cleaned parts for at least fifteen (15) seconds or until dripping stops;
   3. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized or shower-type spray) at a pressure that does not exceed ten (10) pounds per square inch gauge pressure (psig);
   4. Do not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
   5. Minimize drafts to less than 40 meters/minute; and
   6. Refrain from operating the cold cleaning degreaser upon the occurrence of any visible solvent leak until such leak is repaired.

D. Pioneer shall not use any halogenated solvents in the degreasing tanks. [MEDEP Chapter 140, BPT]

E. For those degreasers containing less than 1% VOC, Pioneer shall keep the degreasers' Material Safety Data Sheets (MSDS) on file.

[MEDEP Chapter 130 and Chapter 140]

(27) Surface Coating Press

a. The surface coating press unit (P2) shall not emit in excess of 1,666 pounds of VOC in any calendar month.

b. Pioneer shall maintain monthly records to document the name and identification of each coating and the mass of VOC per volume of each coating, excluding water and exempt compounds, as applied, used each month in the surface coating press, and the total emissions at the unit each month. [MEDEP Chapter 129]

(28) Storage Tanks

a. For VOC RACT, Pioneer shall maintain conservation vents on: the formalin storage tank (Tank 30); the methanol storage tank (Tank 29); the phenolic resin storage tank (Tank

60); the NPG (neopentyl glycol) storage tank (Tank 66); the blended "raw" phenolic resin storage tanks (Tanks 45, 46, 47, 48); and the urea-formaldehyde resin storage tank (Tank 49). In order to document maintenance of the conservation vents, Pioneer shall keep a maintenance log recording the date of conservation vent inspections as well as all routine maintenance when performed. Conservation vent inspections shall be performed, at a minimum, once every 6 months. [MEDEP Chapter 134]

b. Pioneer's applicable "affiliated equipment" as defined in the Paper and Other Web Coating MACT are subject to the Organic Liquid Distribution MACT (40 CFR Part 63, Subpart EEEE) that was promulgated on February 3, 2004 with a compliance date of February 5, 2007.

(29) Storage Silos and Associated Equipment

a. Visible emissions from each of the respective storage silos and associated equipment baghouses shall be limited to 10% opacity on a 6-minute block average basis except for no more than (1) one (6) six minute block average in a 1-hour period. The facility shall take corrective action if visible emissions from the baghouses exceed 5% opacity [MEDEP Chapter 140, BPT]

b. Particulate emissions from the storage silos and associated equipment shall be limited to the applicable limitation from Table 105A or the formula in Section 4 of Chapter 105. [MEDEP Chapter 105]

c. In order to document maintenance of the baghouses, Pioneer shall keep a maintenance log recording the date and location of all bag failures. The log shall be maintained for at least six years and available to the Department upon request. [MEDEP Chapter 140, BPT]

(30) Resin Crusher/Grinder and Associated Equipment

a. Visible emissions from the grinder and associated equipment baghouses shall be limited to 10% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [MEDEP Chapter 140]

b. Particulate emissions from the grinder and associated equipment shall be limited to the applicable limitation from Table 105A or the formula in Section 4 of Chapter 105. [MEDEP Chapter 105]

c. In order to document maintenance of the baghouses, Pioneer shall keep a maintenance log recording the date and location of all bag failures. The log shall be maintained for at least six years and available to the Department upon request. [MEDEP Chapter 140, BPT]

(31) Chemical Loading/Unloading Operations

a. Pioneer's applicable chemical loading/unloading activities are subject to Organic Liquids Distribution (Non-Gasoline) NESHAP (40 CFR Part 63 Subpart EEEE) that was promulgated on February 3, 2004 with a compliance date of February 5, 2007.

(32) Screen Print Operation

a. Pioneer will limit the use of VOCs in the screen print operation to less than 2000 pounds of VOCs per year.

(33) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on July 31st and Jan 31st of each year with the initial semiannual report due July 31, 2004. The facility's designated responsible official must sign this report.

The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date.

A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.
[MEDEP Chapter 140]

(34) **Annual Compliance Certification**

Pioneer shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The initial annual compliance certification is due January 31 of each year with the initial annual certification due Jan 31, 2005. The facility's designated responsible official must sign this report.

The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the

Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [MEDEP Chapter 140]

(35) **Annual Emission Statement**

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

A. A computer program and accompanying instructions supplied by the Department;

or

B. A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted no later than September 1 or as otherwise specified in Chapter 137.

[MEDEP Chapter 137]

(36) **Biennial Air Toxics Emissions Statement**

In accordance with MEDEP Chapter 137, the licensee shall report, no later than September 1, every two years (2004, 2006, etc.) or in a timeframe designated to the Department, the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions on the Air Toxics emissions inventory portion should be directed to:

Attn: Toxics Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

The emission statement must be submitted no later than September 1 or as otherwise specified in Chapter 137.

[MEDEP Chapter 137]

(37) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

Origin and Authority	Requirement Summary	Enforceability
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, sub-§5	Mercury Emission Limit	Enforceable by State-only

(38) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. An example of such units include refrigerators and any size air conditioner that contain CFCs. [40 CFR, Part 82, Subpart F]

(39) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Pioneer shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

(40) **Risk Management Plan**

The licensee is subject to all applicable requirements of 40 CFR Part 68 (Risk Management Plan).

(41) **Certification by a Responsible Official**
All reports (including quarterly reports, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

(42) **Annual Fee**
Pioneer shall pay the annual air emission license fee within 30 days of June 30th of each year. Pursuant to Title 38-353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under section 341-D, subsection 3.

DONE AND DATED IN AUGUSTA, MAINE THIS 20th DAY OF April 2004.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brooks for
DAWN R. GALLAGHER, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 28, 1996
Date of application acceptance: October 28, 1996

Date filed with the Board of Environmental Protection

FILED
APR 21 2004
BOARD OF ENVIRONMENTAL PROT.
STATE OF MAINE

This Order prepared by Edwin Cousins, Bureau of Air Quality.